

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Yudina et al.

v.

Kriss et al.

Case No. 2:16-CV-00932-DJH

**DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER RE: DEPOSITIONS OF LARISSA YUDINA AND
OST GROUP (Dkt. 36.)**

Exhibit A: Declaration of Adam C. Sherman

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(480) 421-1001

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16 *Attorneys for Defendants*

17 UNITED STATES DISTRICT COURT
18 FOR THE DISTRICT OF ARIZONA

19 LARISSA YUDINA, an individual;
20 FELIX SATER, an individual; and OST
21 GROUP, a foreign entity;

22 Plaintiffs,

23 vs.

24 JODY KRISS, an individual; and EAST
25 RIVER PARTNERS, LLC, a foreign
26 corporation; (posting on various websites)

27 Defendants.
28

Case No. 2:16-cv-00932-DJH

**DECLARATION OF ADAM C.
SHERMAN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER RE:
DEPOSITIONS OF LARISSA YUDINA
AND OST GROUP (Dkt. 36.)**

1 I, Adam C. Sherman, declare and states as follows:

2 1. I am over 18 years of age and, unless otherwise specified, the matters set
3 forth herein are based upon my personal knowledge. If called to testify, I could testify to
4 these facts.

5 2. Attached as Exhibit 1 is a true and accurate copy of the search results from
6 the travel website www.kayak.com for a roundtrip flight from Moscow to Phoenix
7 departing on March 6, 2017 and returning on March 8, 2017. The least expensive
8 itinerary resulting from that search was \$681.

9 3. Attached as Exhibit 2 is a true and accurate copy of the search results from
10 the travel website www.kayak.com for a roundtrip flight from Moscow to New York City
11 departing on March 6, 2017 and returning on March 8, 2017. The least expensive
12 itinerary resulting from that search was \$410.

13 4. Attached as Exhibit 3 is a true and accurate copy of a page from the U.S.
14 Department of State's Website, which explains that the application fee for a business
15 visitor visa would cost \$160.

16 5. Attached as Exhibit 4 is a true and accurate copy of the viewdns.info search
17 results listing the domain names registered with the email address kyudin11@gmail.com,
18 which include the domains that are the subject of this lawsuit.

19 6. Attached as Exhibit 5 is a true and accurate copy of Larissa Yudina's and
20 OST's Verified Responses to Defendants' First Set of Interrogatories.

21 7. Attached as Exhibit 6 is a true and accurate copy of the WHOIS information
22 regarding the registration of the domain www.jodykriss.today.

23 8. Attached as Exhibit 7 is a true and accurate copy of the affidavit Konstantin
24 Yudin provided in another case pending in Ohio.

25 9. Attached as Exhibit 8 is a true and accurate copy of the WHOIS information
26 regarding the registration of the domain www.jodykriss.com.


27 10. Attached as Exhibit 9 is a true and accurate copy of the Google Maps
28 directions between 565 Plandome Rd, Manhasset, New York 11030 to 130 Shore Road,

1 Port Washington, New York 11050, which are the business addresses provided by OST
2 Group and Felix Sater, respectively.

3 FURTHER DECLARANT SAETH NAUGHT.

4 I declare under penalty of perjury under the laws of the United States of America
5 and the state of Arizona that the foregoing is true and accurate to the best of my
6 knowledge, information, and belief.

7 Executed this 9th day of February 2017 at Cincinnati, Ohio.

8
9
10 
11 Adam C. Sherman, Esq.

Keresmar & Feltus PLLC
7150 East Camelback Road, Suite 285
Scottsdale, Arizona 85251
(480) 421-1001

EXHIBIT 1

Flights More

Create a price alert

Stops

nonstop
1 stop \$729
2+ stops \$681

Times

Take-off Moscow (MOW)
Mon 4:30a – 9:30p

Take-off Phoenix (PHX)
Wed 12:30a – Thu 12:00a

Show landing times

Airports

Depart/Return same

Moscow
SVO: Sheremetyevo \$681
DME: Domodedovo \$796
VKO: Vnukovo \$1165
Phoenix
PHX: Sky Harbor Intl \$681

Airlines

Carrier	Alliance
airberlin	\$3092
Austrian Airlines	\$1371
British Airways	\$2522
Air Europa	\$3309
Alitalia	\$2754
China Southern	\$4206
Delta	\$681
Finnair	\$1227
KLM	\$790
Korean Air	\$2996
Lufthansa	\$1171
SWISS	\$1343
United	\$796
Multiple airlines	
Show operators	

Booking Providers

Alitalia	\$2754
British Airways	\$2522
Air Europa	\$3309
CheapTickets.com	
China Southern	\$4206
Delta	\$681
eDreams	\$1231
Expedia.com	

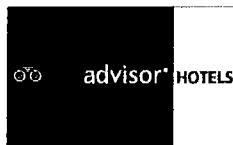
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MOW PHX Mar 6 — Mar 8 Economy 1
872 of 1049 flights Monday Wednesday cabin traveler

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\$100 Quality Inn Phoenix Ai... View Deal
\$181 Radisson Hotel Phoe... View Deal
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\$681

Delta



Della

5:30a SVO
11:24a PHX

11:28p PHX 27h 58m 2 stops (AMS, LAX)
5:00p SVO 19h 36m 2 stops (LAX, AMS)

View Deal

Show details < Share
Operated by Delta, Compass DBA Delta Connection, KLM, Skywest DBA Delta Connection

\$681

Delta



Della

5:30a SVO
6:38a PHX

11:28p PHX 27h 58m 2 stops (AMS, LAX)
5:00p SVO 24h 22m 2 stops (LAX, AMS)

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Operated by Delta, KLM, Skywest DBA Delta Connection

\$693

Delta



Della

5:30a SVO
11:24a PHX

9:28p PHX 25h 58m 2 stops (AMS, LAX)
5:00p SVO 19h 36m 2 stops (LAX, AMS)

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Show details < Share
Operated by Delta, Compass DBA Delta Connection, KLM

\$693

Delta



Della

5:30a SVO
6:38a PHX

9:28p PHX 25h 58m 2 stops (AMS, LAX)
5:00p SVO 24h 22m 2 stops (LAX, AMS)

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Try your search on these other sites

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\$711

Delta



Della

5:30a SVO
11:24a PHX

8:47p PHX 25h 17m 2 stops (AMS, JFK)
5:00p SVO 19h 36m 2 stops (LAX, AMS)

View Deal

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Operated by Delta, Compass DBA Delta Connection, KLM

\$711

Delta



Della

5:30a SVO
11:24a PHX

11:30p PHX 28h 00m 2 stops (AMS, JFK)
5:00p SVO 19h 36m 2 stops (LAX, AMS)

View Deal

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Operated by Delta, Compass DBA Delta Connection, KLM

\$711

Delta



Della

5:30a SVO
11:24a PHX

11:30p PHX 28h 00m 2 stops (AMS, JFK)
5:00p SVO 19h 36m 2 stops (LAX, AMS)

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Delta



Delta

5:30a SVO

8:47p PHX

25h 17m

2 stops (AMS, JFK)

6:38a PHX

5:00p SVO

24h 22m

2 stops (LAX, AMS)

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Delta



Delta

5:30a SVO

11:28p PHX

27h 58m

2 stops (AMS, LAX)

6:45a PHX

5:00p SVO

24h 15m

2 stops (JFK, AMS)

View Deal

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Delta



Delta

5:30a SVO

11:28p PHX

27h 58m

2 stops (AMS, LAX)

6:45a PHX

5:00p SVO

24h 15m

2 stops (JFK, AMS)

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Operated by Delta, KLM, Skywest DBA Delta Connection

\$711

Delta



Delta

5:30a SVO

11:30p PHX

28h 00m

2 stops (AMS, JFK)

6:38a PHX

5:00p SVO

24h 22m

2 stops (LAX, AMS)

View Deal


Show details

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Operated by Delta, KLM

\$711

Delta



Delta

5:30a SVO

11:30p PHX

28h 00m

2 stops (AMS, JFK)

6:38a PHX

5:00p SVO

24h 22m

2 stops (LAX, AMS)

View Deal


Show details

< Share

Operated by Delta, KLM

\$718

Delta



Delta

5:30a SVO

5:07p PHX

21h 37m

2 stops (AMS, LAX)

11:24a PHX

5:00p SVO

19h 36m

2 stops (LAX, AMS)

View Deal


Show details

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Operated by Delta, Compass DBA Delta Connection, KLM, Skywest DBA Delta Connection

\$718

Delta



Delta

5:30a SVO

5:07p PHX

21h 37m

2 stops (AMS, LAX)

6:38a PHX

5:00p SVO

24h 22m

2 stops (LAX, AMS)

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Operated by Delta, KLM, Skywest DBA Delta Connection

\$723

Delta



Delta

5:30a SVO

9:28p PHX

25h 58m

2 stops (AMS, LAX)

6:45a PHX

5:00p SVO

24h 15m

2 stops (JFK, AMS)

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2/3

EXHIBIT 2

Flights More

Create a price alert

Stops

nonstop	\$434
1 stop	\$410
2+ stops	\$427

Times

Take-off Moscow (MOW)
Mon 1:30a – Tue 12:00a

Take-off New York (NYC)
Wed 12:30a – Thu 12:00a

Show landing times ▾

Airports [Show all](#)

Depart/Return same

Moscow	
SVO: Sheremetyevo	\$410
DME: Domodedovo	\$563
VKO: Vnukovo	\$486
New York	
JFK: John F Kenn...	\$410
EWR: Newark	\$410
LGA: LaGuardia	\$427
SWF: Stewart	\$439

Airlines

Carrier Alliance

Aeroflot	\$434
airberlin	\$633
Air China	\$1746
Air Europa	
Air France	\$431
Alitalia	\$1524
Austrian Airlines	\$1143
British Airways	\$2302
Brussels Airlines	\$1800
China Eastern	\$1002
China Southern	\$3819
Czech Airlines	\$3570
Delta	\$427
EL AL	\$5274
Emirates	\$1132
Etiihad Airways	\$981
Finnair	\$999
Gulf Air	\$6442
Icelandair	\$1781
KLM	\$410
Korean Air	\$2583
LOT Polish Airlines	\$962
Lufthansa	\$1159
Singapore Airlines	\$13327
SriLankan	\$12606
SWISS	\$1145
TAROM	\$5095
Turkish Airlines	\$486
United	\$563
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nonstop

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\$410

KLM



KLM

5:30a SVO

1:16p JFK

15h 46m

1 stop (AMS)

6:00p EWR

5:00p SVO

15h 00m

1 stop (AMS)

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Operated by KLM, Delta

\$410

KLM



KLM

5:30a SVO

1:16p JFK

15h 46m

1 stop (AMS)

4:29p JFK

5:00p SVO

16h 31m

1 stop (AMS)

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Operated by KLM, Delta

\$410

KLM



KLM

5:30a SVO

3:30p EWR

18h 00m

1 stop (AMS)

6:00p EWR

5:00p SVO

15h 00m

1 stop (AMS)

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Operated by KLM, Delta

\$410

KLM



KLM

5:30a SVO

3:55p JFK

18h 25m

1 stop (AMS)

6:00p EWR

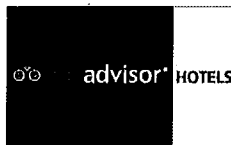
5:00p SVO

15h 00m

1 stop (AMS)

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KLM



KLM

5:30a SVO

3:30p EWR

18h 00m

1 stop (AMS)

4:29p JFK

5:00p SVO

16h 31m

1 stop (AMS)

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KLM



KLM

5:30a SVO

3:55p JFK

18h 25m

1 stop (AMS)

4:29p JFK

5:00p SVO

16h 31m

1 stop (AMS)

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KLM

5:30a SVO

1:16p JFK

15h 46m

1 stop (AMS)

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Air China	\$1746
Air Europa	
Air France	\$410
Alitalia	\$1524
Austrian Airlines	\$1143
British Airways	\$2302
Brussels Airlines	\$1800

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6:00p EWR 2:00a SVO 24h 00m 1 stop (AMS)

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KLM

KLM

5:30a SVO 3:30p EWR 18h 00m 1 stop (AMS)
6:00p EWR 2:00a SVO 24h 00m 1 stop (AMS)

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Operated by KLM, Delta

\$410
KLM

KLM

5:30a SVO 3:55p JFK 18h 25m 1 stop (AMS)
6:00p EWR 2:00a SVO 24h 00m 1 stop (AMS)

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\$410
Vayama

Air France / KLM

7:00a SVO 12:59p JFK 13h 59m 1 stop (CDG)
6:00p EWR 5:00p SVO 15h 00m 1 stop (AMS)

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Delta operates flight 3628, 6178.

\$410
Vayama

Air France / KLM

7:00a SVO 12:59p JFK 13h 59m 1 stop (CDG)
5:50p JFK 5:00p SVO 15h 10m 1 stop (AMS)

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\$410
Vayama

Air France / KLM

9:45a SVO 4:05p JFK 14h 20m 1 stop (CDG)
6:00p EWR 5:00p SVO 15h 00m 1 stop (AMS)

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Vayama

Air France / KLM

9:45a SVO 4:05p JFK 14h 20m 1 stop (CDG)
5:50p JFK 5:00p SVO 15h 10m 1 stop (AMS)

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Vayama

Air France / KLM

7:00a SVO 12:59p JFK 13h 59m 1 stop (CDG)
4:29p JFK 5:00p SVO 16h 31m 1 stop (AMS)

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Delta operates flight 3628, 6070.

\$410
Vayama

Air France / KLM

9:45a SVO 4:05p JFK 14h 20m 1 stop (CDG)
4:29p JFK 5:00p SVO 16h 31m 1 stop (AMS)



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EXHIBIT 3

Important Notice**Executive Order on Visas - Important Announcement**travel.state.govU.S. Passports &
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Child Abduction](#)[Contact Us](#)[Find U.S. Embassies
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Visitor Visa

B

Important information on Executive Order 13769 – Protecting the Nation from Foreign Terrorist Entry into the United States.

Overview

Generally, a citizen of a foreign country who wishes to enter the United States must first obtain a visa, either a nonimmigrant visa for temporary stay, or an immigrant visa for permanent residence. Visitor visas are nonimmigrant visas for persons who want to enter the United States temporarily for business (visa category B-1), tourism, pleasure or visiting (visa category B-2), or a combination of both purposes (B-1/B-2).

Here are some examples of activities permitted with a visitor visa:

[Expand All](#)**Business (B-1):**

- consult with business associates
- attend a scientific, educational, professional, or business convention or conference
- settle an estate
- negotiate a contract

Learn more about Business Travel to the United States  (PDF - 362 KB) on a visitor visa.

Tourism and Visit (B-2):**Travel Purposes Not Permitted On Visitor Visas:**

How to Apply

There are several steps to apply for a visa. The order of these steps and how you complete them may vary at the U.S. Embassy or Consulate where you apply. Please consult the instructions available on the U.S. Embassy or Consulate website where you will apply.

Complete the Online Visa Application

- **Online Nonimmigrant Visa Application, Form DS-160** – Learn more about completing the DS-160. You must: 1) complete the online visa application and 2) print the application form confirmation page to bring to your interview.
- **Photo** – You will upload your photo while completing the online Form DS-160. Your photo must be in the format explained in the Photograph Requirements.

Schedule an Interview

While interviews are generally not required for applicants of certain ages outlined below, consular officers have the discretion to require an interview of any applicant, regardless of age.

If you are age:

13 and younger

14-79

80 and older

Then an interview is:

Generally not required

Required (some exceptions for renewals)

Generally not required

You must schedule an appointment for your visa interview, generally, at the U.S. Embassy or Consulate in the country where you live. You may schedule your interview at any U.S. Embassy or Consulate, but be aware that it may be difficult to qualify for a visa outside of your place of permanent residence.

Wait times for interview appointments vary by location, season, and visa category, so you should apply for your visa early. Review the interview wait time for the location where you will apply:

Appointment Wait Time

Select a U.S. Embassy or Consulate:

Where will you apply?

Prepare for Your Interview

- **Fees - Pay the non-refundable visa application fee**, if you are required to pay it before your interview. When your visa is approved, you may also pay a visa issuance fee, if applicable to your nationality. Fee information is provided below:

Application Fee

\$160

ALL FEES

Select your nationality to see Issuance Fee

- Review the instructions available on the website of the embassy or consulate where you will apply to learn more about fee payment.

Gather Required Documentation

Gather and prepare the following required documents before your visa interview:

- **Passport** valid for travel to the United States - Your passport must be valid for at least six months beyond your period of stay in the United States, unless exempt by country-specific agreements (PDF - 57 KB). If more than one person is included in your passport, each person who needs a visa must submit a separate application.
- **Nonimmigrant Visa Application, Form DS-160 confirmation page**
- **Application fee payment receipt**, if you are required to pay before your interview.
- **Photo** - You will upload your photo while completing the online Form DS-160. If the photo upload fails, you must bring one printed photo in the format explained in the Photograph Requirements.

Additional Documentation May Be Required

Review the instructions for how to apply for a visa on the website of the embassy or consulate where you will apply. Additional documents may be requested to establish if you are qualified. For example, additional requested documents may include evidence of:

- The purpose of your trip;
- Your intent to depart the United States after your trip; and/or
- Your ability to pay all costs of the trip.

Evidence of your employment and/or your family ties may be sufficient to show the purpose of your trip and your intent to return to your home country. If you cannot cover all the costs for your trip, you may show evidence that another person will cover some or all costs for your trip.

Note: Visa applicants must qualify on the basis of the applicant's residence and ties abroad, rather than assurances from U.S. family and friends. A letter of invitation or Affidavit of Support is not needed to apply for a nonimmigrant tourist visa. If you do choose to bring a letter of invitation or Affidavit of Support to your interview, please remember that it is not one of the factors that we use in determining whether to issue or deny a nonimmigrant tourist visa.

Attend Your Visa Interview

During your visa interview, a consular officer will determine whether you are qualified to receive a visa, and if so, which visa category is appropriate based on your purpose of travel. You will need to establish that you meet the requirements under U.S. law to receive the category of visa for which you are applying.

Ink-free, digital fingerprint scans will be taken as part of your application process. They are usually taken during your interview, but this varies based on location.

After your visa interview, your application may require further administrative processing. You will be informed by the consular officer if further processing is necessary for your application.

When the visa is approved, you may pay a visa issuance fee if applicable to your nationality, and will be informed how your passport with visa will be returned to you. Review the visa processing time, to learn how soon your passport with visa will generally be ready for pick-up or delivery by the courier.

Entering the United States

A visa allows a foreign citizen to travel to a U.S. port-of-entry (generally an airport) and request permission to enter the United States. A visa does not guarantee entry into the United States. The Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP) officials at the port-of-entry have authority to permit or deny admission to the United States. If you are allowed to enter the United States, the CBP official will provide an admission stamp or a paper Form I-94, Arrival/Departure Record. Learn more about admissions and entry requirements, restrictions about bringing food, agricultural products, and other restricted/prohibited goods, and more by reviewing the CBP website .

Extending Your Stay

See [Extend Your Stay](#) on the U.S. Citizenship and Immigration Services (USCIS) website to learn about requesting to extend your stay beyond the date indicated on your admission stamp or paper Form I-94.

You must depart the United States on or before the date indicated on your admission stamp or paper Form I-94, unless your request to extend your stay is approved by USCIS.

Failure to depart the United States on time will result in you being out of status. Under U.S. law, visas of travelers who are out of status are automatically voided (Section 222(g) of the Immigration and Nationality Act). If you had a multiple-entry visa and it was voided due to you being out of status, it will not be valid for future entries into the United States.

Failure to depart the United States on time may also result in you being ineligible for visas you may apply for in the future. Review [Visa Denials and Ineligibilities and Waivers: Laws](#) to learn more.

Change of Status

While in the United States, you may be able to request that U.S. Citizenship and Immigration Services (USCIS) change your nonimmigrant status to another nonimmigrant category. See [Change My Nonimmigrant Status](#) on the USCIS website to learn more.

Requesting a change of status from USCIS while you are in the United States and before your authorized stay expires does not require that you apply for a new visa. However, if you cannot remain in the United States while USCIS processes your change of status request, you must apply for a visa at a U.S. Embassy or Consulate.

Additional Information

- Visitors are not permitted to accept employment or work in the United States.
- We cannot guarantee that you will be issued a visa. Do not make final travel plans or buy tickets until you have a visa.
- Unless canceled or revoked, a visa is valid until its expiration date. Therefore, a valid U.S. visa in an expired passport is still valid. If you have a valid visa in your expired passport, do not remove it from your expired passport. You may use your valid visa in your expired passport along with a new valid passport for travel and admission to the United States.

Travel for Medical Treatment

Visitor Visas for Personal or Domestic Employees (B-1)

Visa Renewal

Do I need a visa if I have an ABTC?

How can I use my ABTC when I apply for my visa?

Visa Annotations for Certain Maritime Industry Workers

Visa Denial and Ineligibility

I was refused a visa, under Section 214(b). May I reapply?

Misrepresentation or Fraud

Citizens of Canada and Bermuda

Citizens of China

Citizens of Mexico

Further Questions

Travel Without a Visa

- VWP Visa Waiver Program**

Tourist or business travelers who are citizens of participating countries may be eligible to visit the United States without a visa. Visits must be 90 days or less, and travelers must meet all requirements.



Citizens of Canada and Bermuda generally do not need visas for tourism and visits.

More Information

- A-Z Index
- Legal Rights & Protections
- Lost/Stolen Travel Documents
- Denials
- Fraud Warning
- Visa Expiration Date
- Automatic Revalidation
- Nonimmigrants in the United States—Applying for Visas in Canada or Mexico
- Visa Applicants - State Sponsors of Terrorism
- Border Security/Safety
- Find a U.S. Embassy or Consulate
- Customer Service Statement

In the United States

- VisitTheUSA
- National Park Service: Celebrate Our Centennial



FAQs: About Visas - the Basics



FAQs: DS-160



Let's Talk Numbers

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Visa Newsroom

Reports and Statistics

Law and Policy

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Students Abroad

U.S. Visa

Intercountry Adoption

International Parental Child Abduction

This site is managed by the Bureau of Consular Affairs, U.S. Department of State.

EXHIBIT 4



**ORDER ONLINE
AND WE'LL DELIVER.**

Tools | **API** | **Research** | **Data**

ViewDNS.info > **Tools** > **Reverse Whois Lookup**

This free tool will allow you to find domain names owned by an individual person or company. Simply enter the email address or name of the person or company to find other domains registered using those same details. [FAQ](#).

Registrant Name or Email Address:

Reverse Whois results for kyudin11@gmail.com

There are 81 domains that matched this search query.
These are listed below:

Domain Name	Creation Date	Registrar
aboutjodykriss.net	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
barbaranicolinikriss.org	2015-10-13	INTERNET DOMAIN SERVICE BS CORP
blackmailer.net	2015-01-21	INTERNET DOMAIN SERVICE BS CORP
blackmailers.info	2015-01-21	INTERNET DOMAIN SERVICE BS CORP
blowjobgram.com	2013-07-14	INTERNET DOMAIN SERVICE BS CORP
boycotttheboycott.com	2013-02-23	INTERNET DOMAIN SERVICE BS CORP
chudiejekam.info	2015-10-07	INTERNET DOMAIN SERVICE BS CORP
chudiejekam.net	2015-10-07	INTERNET DOMAIN SERVICE BS CORP
chudiejekam.org	2015-10-07	INTERNET DOMAIN SERVICE BS CORP
cuntboyjody.com	2014-04-11	INTERNET DOMAIN SERVICE BS CORP
cuntboy.net	2014-04-11	INTERNET DOMAIN SERVICE BS CORP
cuntman.net	2014-04-11	INTERNET DOMAIN SERVICE BS CORP
eastriverpartner.info	2014-12-12	INTERNET DOMAIN SERVICE BS CORP
eastriverpartner.net	2014-12-12	INTERNET DOMAIN SERVICE BS CORP
eastriverpartners2.com	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
eastriverpartners.biz	2014-12-12	INTERNET DOMAIN SERVICE BS CORP
eastriverpartners.build	2016-02-11	GODADDY
eastriverpartners.construction	2016-02-11	GODADDY.COM, LLC
eastriverpartnersgroup.com	2014-12-19	GODADDY.COM, LLC
eastriverpartners.house	2014-12-19	GODADDY.COM, LLC
eastriverpartners.info	2012-07-10	GODADDY.COM, LLC
eastriverpartners.land	2016-02-11	GODADDY.COM, LLC
eastriverpartnersllc.com	2014-12-12	GODADDY.COM, LLC
eastriverpartners.mobi	2016-02-11	GODADDY.COM, LLC
eastriverpartners.net	2012-07-10	GODADDY.COM, LLC
eastriverpartnersny.com	2014-12-19	GODADDY.COM, LLC
eastriverpartnersonline.com	2014-12-19	INTERNET DOMAIN SERVICE BS CORP
eastriverpartnersonline.info	2014-12-19	INTERNET DOMAIN SERVICE BS CORP
eastriverpartners.org	2012-07-10	INTERNET DOMAIN SERVICE BS CORP
eastriverpartners.partners	2016-02-11	GODADDY.COM, LLC
eastriverpartners.rentals	2016-02-11	GODADDY.COM, LLC
eastriverpartners.singles	2014-12-19	GODADDY.COM, LLC
eastriverpartners.today	2014-12-12	GODADDY.COM, LLC
extortionist.info	2015-01-21	INTERNET DOMAIN SERVICE BS CORP
extortionists.info	2015-01-21	INTERNET DOMAIN SERVICE BS CORP
extortionists.net	2015-01-21	INTERNET DOMAIN SERVICE BS CORP
fecalboy.com	2015-04-19	INTERNET DOMAIN SERVICE BS CORP
fecalmatter.info	2015-04-18	INTERNET DOMAIN SERVICE BS CORP
fecalmatter.lawyer	2015-04-18	GODADDY.COM, LLC
fecesman.com	2015-04-19	INTERNET DOMAIN SERVICE BS CORP

felcherboy.com	2015-01-17	GODADDY.COM, LLC
felcher.info	2015-01-17	INTERNET DOMAIN SERVICE BS CORP
fredoberlander.info	2012-10-13	GODADDY.COM, LLC
iamadirtbag.com	2013-04-25	GODADDY.COM, LLC
iamafaggot.com	2013-04-25	GODADDY.COM, LLC
iamascumbag.com	2013-04-25	GODADDY.COM, LLC
interactivetellermachine.com	2013-01-31	GODADDY.COM, LLC
jodykriss.biz	2014-12-19	GODADDY.COM, INC.
jodykriss.com	2012-07-10	GODADDY.COM, LLC
jodykriss.info	2012-07-10	GODADDY.COM, LLC
jodykriss.life	2016-06-25	GODADDY.COM, LLC
jodykriss.net	2012-07-10	GODADDY.COM, LLC
jodykriss.org	2012-07-10	GODADDY.COM, LLC
jodykrissthief.com	2013-04-25	GODADDY.COM, LLC
jodykriss.today	2016-06-25	GODADDY.COM, LLC
jodykriss.us	2016-06-25	GODADDY.COM, INC.
jodykriss.world	2016-06-25	GODADDY.COM, LLC
jodylkriss.com	2012-07-10	GODADDY.COM, LLC
jodylkriss.info	2012-07-10	GODADDY.COM, LLC
jodylkriss.net	2012-07-10	GODADDY.COM, LLC
jodylkriss.org	2012-07-10	GODADDY.COM, LLC
jodythefelcher.com	2015-01-17	GODADDY.COM, LLC
krissjody.net	2016-04-11	GODADDY.COM, LLC
michaelchudiejekam.com	2015-10-07	GODADDY.COM, LLC
richardlerner.esq.com	2014-04-15	INTERNET DOMAIN SERVICE BS CORP
richardlerner.esq.info	2014-04-15	INTERNET DOMAIN SERVICE BS CORP
richardlerner.esq.net	2014-04-15	INTERNET DOMAIN SERVICE BS CORP
richardlerner.esq.org	2014-04-15	INTERNET DOMAIN SERVICE BS CORP
richlerner.com	2014-04-04	INTERNET DOMAIN SERVICE BS CORP
richlerner.info	2014-04-21	INTERNET DOMAIN SERVICE BS CORP
richlerner.net	2014-04-21	INTERNET DOMAIN SERVICE BS CORP
richlerner.org	2014-04-21	INTERNET DOMAIN SERVICE BS CORP
theastriverpartners.com	2014-08-13	GODADDY.COM, LLC
thefelcher.com	2015-01-17	INTERNET DOMAIN SERVICE BS CORP
thejodykriss2.com	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
thetruthaboutjodykriss.com	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
truthaboutjodykriss.com	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
truthaboutjodykriss.net	2014-08-13	INTERNET DOMAIN SERVICE BS CORP
vaginaboy.com	2014-04-11	INTERNET DOMAIN SERVICE BS CORP
vor-ton.com	2014-03-26	INTERNET DOMAIN SERVICE BS CORP
vortonjodykriss.com	2014-03-26	INTERNET DOMAIN SERVICE BS CORP

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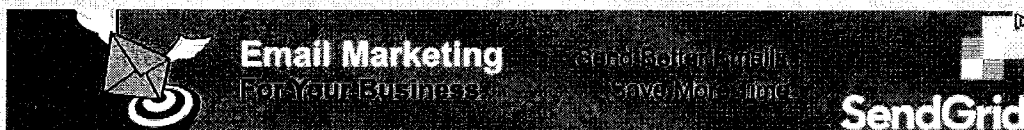
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EXHIBIT 5

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12
13 **UNITED STATES DISTRICT COURT**
14
15 **FOR THE DISTRICT OF ARIZONA**

16 Larissa Yudina, an individual; Felix
17 Sater, an individual; and OST Group, a
18 foreign entity;

19 Plaintiffs,

20 v.

21 Jody Kriss, an individual; and East River
22 Partners, LLC, a foreign corporation;

23 Defendants.

24 Jody Kriss, an individual; and East River
25 Partners, LLC, a foreign corporation;

26 Counterclaimants,

v.

Larissa Yudina, an individual; Felix
Sater, an individual; and OST Group, a
foreign entity;

Counterdefendants,

Case No. 2:16-cv-00932-DJH

**PLAINTIFF LARISSA YUDINA'S
RESPONSES TO DEFENDANTS'
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION**

1 Plaintiff/Counterdefendant Larissa Yudina ("Yudina") hereby responds to
2 Defendants First Set of Interrogatories and Requests for Production of Documents as
3 follows:

4 **INTERROGATORIES**

5
6 **Interrogatory No. 1:**

7 Identify all Persons who registered, or assisted with the registration of, any of the
8 Domains.

9 **Answer:**

10 Yudina responds that the Domains were registered by Yudina, Felix Sater, and
11 Konstantin Yudin.

12
13 **Interrogatory No. 2:**

14 For each Person identified in the Answer to Interrogatory No. 1, list every
15 domain registered by him or her.

16 **Answer:**

17 Yudina responds that the following Domains were registered by Yudina:

18 <theeastriverpartners.com>,
19 <eastriverpartnersllc.com>,
20 <eastriverpartnersny.com>,
<eastriverpartnersgroup.com>.

21 Yudina responds that the following Domains were registered by Felix Sater:

22 <jodykriss.com>,
23 <jodylkriss.com>,
24 <jodykriss.net>,
25 <jodylkriss.net>,
26 <jodykriss.org>,
<jodylkriss.org>,
<jodykriss.info>.

1 <jodylkriss.info>,
2 <krissjody.com>,
3 <jodykrisscrook.com>,
4 <jodykrissvorton.com>,
5 <vortonjodykriss.com>,
6 <jodykriss.co>.

7 Yudina responds that the following Domains were registered by either Sater or
8 Yudina:

9 <eastriverpartners.net>,
10 <eastriverpartners.info>.

11 **Interrogatory No. 3:**

12 Identify all Persons who contributed financially to registration, creation, or
13 Maintenance of the domains or websites.

14 **Answer:**

15 Plaintiff objects to this Interrogatory to the extent it is overbroad, unduly
16 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
17 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
18 lead to the discovery of admissible evidence.

19 Subject to and without waiving any of the above objections, Yudina responds
20 that Yudina, Felix Sater, and Konstantin Yudin contributed financially.

21
22 **Interrogatory No. 4:**

23 Identify all email addresses that You, any of the other Plaintiffs, or anyone acting
24 on Your or their behalf, have used for communications relating to the Domains or
25 Websites.

1 **Answer:**

2 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
3 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
4 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
5 lead to the discovery of admissible evidence.

6 Subject to and without waiving any of the above objections, Yudina responds
7 that Yudina, Felix Sater, and Konstantin Yudin have used the following email
8 addresses: kyudin@gmail.com, felix@regency.net, and felixsater@gmail.com.

9
10 **Interrogatory No. 5:**

11 Identify all Persons who authored or created original Content that appeared on
12 the Websites.

13 **Answer:**

14 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
15 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
16 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
17 lead to the discovery of admissible evidence.

18 Subject to and without waiving any of the above objections, Yudina responds
19 that Yudina, Felix Sater, and Konstantin Yudin contributed to the creation of content.

20

21 **Interrogatory No. 6:**

22 Identify all Persons who provided any other information that appeared on the
23 Websites.

24 **Answer:**

25 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
26 burdensome, lacks specificity as to relevant time or scope, and seeks information that is

1 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
2 lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, Yudina responds as
4 follows: See response to Interrogatory No. 5 above. All information was provided by
5 the news or article sources credited on one or more of the websites for any included
6 news stories or articles therein.

7
8 **Interrogatory No. 7:**

9 Identify the Person(s) responsible for publishing each piece of content that
10 currently exists or has ever existed on each of the Websites from the time each Website
11 was created until April 4, 2016.

12 **Answer:**

13 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
14 burdensome, lacks specificity as to relevant scope, and seeks information that is
15 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
16 lead to the discovery of admissible evidence.

17 Subject to and without waiving any of the above objections, Yudina responds
18 that Yudina, Felix Sater, and Konstantin Yudin were responsible for publishing content.

19
20 **Interrogatory No. 8:**

21 Identify who currently maintains each of the Websites.

22 **Answer:**

23 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
24 burdensome, vague and ambiguous with respect to the word "maintains," and seeks
25 information that is irrelevant to any party's claims or defenses or is otherwise not
26 reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving any of the above objections, Yudina responds
2 that Yudina and Konstantin Yudin maintain the Websites.

3
4 **Interrogatory No. 9:**

5 Identify who currently owns each of the Domains.

6 **Answer:**

7 Yudina responds that the Domains are owned by OST Group.

8
9 **Interrogatory No. 10:**

10 For any of the Domains previously owned by someone other than You, identify
11 the date(s) that You acquired ownership (including the name of each domain and from
12 whom each domain was acquired on the particular date(s)).

13 **Answer:**

14 Yudina responds that she acquired ownership of domains from Felix Sater but
15 does not have historical data on acquisition or transfer dates.

16
17 **Interrogatory No. 11:**

18 Identify all Persons who have ever been responsible for the Maintenance of the
19 Websites.

20 **Answer:**

21 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
22 burdensome, vague and ambiguous with respect to the word "maintains," and seeks
23 information that is irrelevant to any party's claims or defenses or is otherwise not
24 reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving any of the above objections, Yudina responds
2 that Yudina, Felix Sater, Konstantin Yudin, and OST Group have been responsible for
3 maintenance.

4
5 **Interrogatory No. 12:**

6 For each Person identified in the answer to Interrogatory No. 11, list the dates of
7 their involvement.

8 **Answer:**

9 Subject to and without waiving any of the objections to Interrogatory No. 11
10 above, Yudina responds that Yudina, Larissa Yudina, and Konstantin Yudin have all
11 been involved from the beginning.

12
13 **Interrogatory No. 13:**

14 Describe Your relationship with or connection to plaintiff Felix Sater.

15 **Answer:**

16 Yudina responds that she has a historic and current business relationship with
17 plaintiff Felix Sater as a contractor for internet marketing.

18
19 **Interrogatory No. 14:**

20 Describe Your relationship with or connection to plaintiff OST Group.

21 **Answer:**

22 Yudina responds that she is the owner of OST Group.

23
24 **Interrogatory No. 15:**

25 Describe Your relationship with or connection to Konstantin Yudin.

26

1 **Answer:**

2 Yudina responds that Konstantin Yudin is her son and employee of OST Group.

3
4 **Interrogatory No. 16:**

5 State when You first become aware of defendant Jody Kriss.

6 **Answer:**

7 Yudina responds that she first become aware of defendant Jody Kriss as early as
8 2005.

9
10 **Interrogatory No. 17:**

11 State when you first became aware of defendant East River Partners, LLC.

12 **Answer:**

13 Yudina responds that she first become aware of defendant East River Partners,
14 LLC as early as 2005.

15
16 **Interrogatory No. 18:**

17 Identify any or all addresses at which You have resided since 2010, including
18 Your present address.

19 **Answer:**

20 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
21 burdensome, and seeks information that is irrelevant to any party's claims or defenses or
22 is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiving any of the above objections, Yudina responds
24 that she currently resides at Krylatskye Holmy 32 Corpus 1, apt 66, Moscow 121614,
25 Russia.

26

1 **Interrogatory No. 19:**

2 Identify any and all addresses at which You have conducted business since 2010,
3 including Your present address.

4 **Answer:**

5 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
6 burdensome, and seeks information that is irrelevant to any party's claims or defenses or
7 is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

8 Subject to and without waiving any of the above objections, Yudina responds
9 that her current business address is Krylatskye Holmy 32 Corpus 1, apt 66, Moscow
10 121614, Russia.

11
12 **Interrogatory No. 20:**

13 Identify any agreements, written or oral, between you and any of the other
14 Plaintiffs.

15 **Answer:**

16 Yudina objects to this Interrogatory to the extent it is overbroad, unduly
17 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
18 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
19 lead to the discovery of admissible evidence.

20 Subject to and without waiving any of the above objections, Yudina responds
21 that Yudina, through OST Group, has an oral agreement to provide internet marketing
22 services to Felix Sater.

23
24
25
26

REQUESTS FOR DOCUMENTS

Request No. 1:

Produce all Content that was ever posted or published on each of the Websites.

Response:

Yudina objects to this Request to the extent it requests documents or things that are already in Defendants' possession or are publicly available. Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope, and seeks information that is irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving any of the above objections, Yudina responds that she will produce non-privileged, responsive documents within her possession, custody, or control, if any.

Request No. 2:

Produce all Communications between You and plaintiff Larissa Yudina, or anyone acting on her behalf, relating to the Websites or their Content.

Response:

Yudina assumes that Defendants intended to write "plaintiff Felix Sater" but inadvertently wrote "plaintiff Larissa Yudina." If so, Yudina objects to this Request to the extent it requests documents or things that are protected by the attorney-client privilege and/or constitute attorney work product. Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope; and seeks information that is irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

JABURG WILK
Attorneys at Law

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 3:**

6 Produce all Communications between You and plaintiff Larissa Yudina, or
7 anyone acting on her behalf, relating to the Domains.

8 **Response:**

9 Yudina assumes that Defendants intended to write “plaintiff Felix Sater” but
10 inadvertently wrote “plaintiff Larissa Yudina.” If so, Yudina objects to this Request to
11 the extent it requests documents or things that are protected by the attorney-client
12 privilege and/or constitute attorney work product. Yudina also objects to the extent it is
13 overbroad, unduly burdensome, lacks specificity as to relevant time or scope, and seeks
14 information that is irrelevant to any party’s claims or defenses or is otherwise not
15 reasonably calculated to lead to the discovery of admissible evidence.

16 Subject to and without waiving any of the above objections, Yudina responds
17 that she will produce non-privileged, responsive documents within her possession,
18 custody, or control, if any.

19
20 **Request No. 4:**

21 Produce all Communications between You and plaintiff OST Group, or anyone
22 acting on its behalf, relating to the Websites or their Content.

23 **Response:**

24 Yudina objects to this Request to the extent it requests documents or things that
25 are protected by the attorney-client privilege and/or constitute attorney work product.
26 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity

1 as to relevant time or scope, and seeks information that is irrelevant to any party's
2 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
3 admissible evidence.

4 Subject to and without waiving any of the above objections, Yudina responds
5 that she will produce non-privileged, responsive documents within her possession,
6 custody, or control, if any.

7
8 **Request No. 5:**

9 Produce all Communications between You and plaintiff OST Group, or anyone
10 acting on its behalf, relating to the Domains.

11 **Response:**

12 Yudina objects to this Request to the extent it requests documents or things that
13 are protected by the attorney-client privilege and/or constitute attorney work product.
14 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
15 as to relevant time or scope, and seeks information that is irrelevant to any party's
16 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
17 admissible evidence.

18 Subject to and without waiving any of the above objections, Yudina responds
19 that she will produce non-privileged, responsive documents within her possession,
20 custody, or control, if any.

21
22 **Request No. 6:**

23 Produce all Communications between You and Konstantin Yudin, or anyone
24 acting on his behalf, relating to the Websites or their Content.

25
26

Response:

Yudina objects to this Request to the extent it requests documents or things that are protected by the attorney-client privilege and/or constitute attorney work product. Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope, and seeks information that is irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving any of the above objections, Yudina responds that she will produce non-privileged, responsive documents within her possession, custody, or control, if any.

Request No. 7:

Produce all Communications between You and Konstantin Yudin, or anyone acting on his behalf, relating to the Domains.

Response:

Yudina objects to this Request to the extent it requests documents or things that are protected by the attorney-client privilege and/or constitute attorney work product. Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope, and seeks information that is irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving any of the above objections, Yudina responds that she will produce non-privileged, responsive documents within her possession, custody, or control, if any.

1 **Request No. 8:**

2 Produce all Communications between You and any other Person relating to the
3 Websites or their Content.

4 **Response:**

5 Yudina objects to this Request to the extent it requests documents or things that
6 are protected by the attorney-client privilege and/or constitute attorney work product.
7 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
8 as to relevant time or scope, and seeks information that is irrelevant to any party's
9 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving any of the above objections, Yudina responds
12 that she will produce non-privileged, responsive documents within her possession,
13 custody, or control, if any.

14
15 **Request No. 9:**

16 Produce all Communications between You and any other Person relating to the
17 Domains.

18 **Response:**

19 Yudina objects to this Request to the extent it requests documents or things that
20 are protected by the attorney-client privilege and/or constitute attorney work product.
21 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
22 as to relevant time or scope, and seeks information that is irrelevant to any party's
23 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
24 admissible evidence.

25
26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 10:**

6 Produce all other Communications relating to the Websites or their Content.

7 **Response:**

8 Yudina objects to this Request to the extent it requests documents or things that
9 are protected by the attorney-client privilege and/or constitute attorney work product.
10 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
11 as to relevant time or scope, and seeks information that is irrelevant to any party's
12 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to and without waiving any of the above objections, Yudina responds
15 that she will produce non-privileged, responsive documents within her possession,
16 custody, or control, if any.

17
18 **Request No. 11:**

19 Produce all other Communications relating to the Domains.

20 **Response:**

21 Yudina objects to this Request to the extent it requests documents or things that
22 are protected by the attorney-client privilege and/or constitute attorney work product.
23 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
24 as to relevant time or scope, and seeks information that is irrelevant to any party's
25 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
26 admissible evidence.

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 12:**

6 Produce all Documents relating to the Domains.

7 **Response:**

8 Yudina objects to this Request to the extent it requests documents or things that
9 are protected by the attorney-client privilege and/or constitute attorney work product.
10 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
11 as to relevant time or scope, and seeks information that is irrelevant to any party's
12 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to and without waiving any of the above objections, Yudina responds
15 that she will produce non-privileged, responsive documents within her possession,
16 custody, or control, if any.

17
18 **Request No. 13:**

19 Produce all Communications with or relating to GoDaddy pertaining to the
20 Websites or Domains.

21 **Response:**

22 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
23 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
24 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
25 discovery of admissible evidence.

26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 14:**

6 Produce all Documents from GoDaddy relating to the Websites or Domains.

7 **Response:**

8 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
9 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
10 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
11 discovery of admissible evidence.

12 Subject to and without waiving any of the above objections, Yudina responds
13 that she will produce non-privileged, responsive documents within her possession,
14 custody, or control, if any.

15
16 **Request No. 15:**

17 Produce all Communications with Domains By Proxy relating to the Domains.

18 **Response:**

19 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
20 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
21 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
22 discovery of admissible evidence.

23 Subject to and without waiving any of the above objections, Yudina responds
24 that she will produce non-privileged, responsive documents within her possession,
25 custody, or control, if any.

1 **Request No. 16:**

2 Produce all Documents provided to you by Domains By Proxy.

3 **Response:**

4 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
5 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
6 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
7 discovery of admissible evidence.

8 Subject to and without waiving any of the above objections, Yudina responds
9 that she will produce non-privileged, responsive documents within her possession,
10 custody, or control, if any.

11
12 **Request No. 17:**

13 Produce all Documents and Communications constituting, evidencing, or relating
14 to advertisements or offers pertaining to creation of content for the Websites or content
15 related to Defendants.

16 **Response:**

17 Yudina objects to this Request to the extent it requests documents or things that
18 are publicly available. Yudina also objects to the extent it is overbroad, unduly
19 burdensome, lacks specificity as to relevant time or scope, is vague and ambiguous with
20 respect to the phrase "advertisements or offers pertaining to creation of content," and
21 seeks information that is irrelevant to any party's claims or defenses or is otherwise not
22 reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiving any of the above objections, Yudina responds
24 that she will produce non-privileged, responsive documents within her possession,
25 custody, or control, if any.

26

1 **Request No. 18:**

2 Produce all Communications between or among Plaintiffs referring to,
3 mentioning, or otherwise relating to Defendants.

4 **Response:**

5 Yudina objects to this Request to the extent it requests documents or things that
6 are protected by the attorney-client privilege and/or constitute attorney work product.
7 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
8 as to relevant time or scope, and seeks information that is irrelevant to any party's
9 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving any of the above objections, Yudina responds
12 that she will produce non-privileged, responsive documents within her possession,
13 custody, or control, if any.

14
15 **Request No. 19:**

16 Produce all Documents referring to, mentioning, or otherwise relating to
17 Defendants.

18 **Response:**

19 Yudina objects to this Request to the extent it requests documents or things that
20 are protected by the attorney-client privilege and/or constitute attorney work product.
21 Yudina also objects to the extent it requests documents or things that are already in
22 Defendants' possession or are publicly available. Yudina further objects to the extent it
23 is overbroad, unduly burdensome, lacks specificity as to relevant time or scope, and
24 seeks information that is irrelevant to any party's claims or defenses or is otherwise not
25 reasonably calculated to lead to the discovery of admissible evidence.

26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 20:**

6 Produce all Communications between You and any other Persons referring to,
7 mentioning, or otherwise relating to Defendants.

8 **Response:**

9 Yudina objects to this Request to the extent it requests documents or things that
10 are protected by the attorney-client privilege and/or constitute attorney work product.
11 Yudina also objects to the extent it is overbroad, unduly burdensome, lacks specificity
12 as to relevant time or scope, and seeks information that is irrelevant to any party's
13 claims or defenses or is otherwise not reasonably calculated to lead to the discovery of
14 admissible evidence.

15 Subject to and without waiving any of the above objections, Yudina responds
16 that she will produce non-privileged, responsive documents within her possession,
17 custody, or control, if any.

18
19 **Request No. 21:**

20 Produce all Documents constituting, evidencing, or relating to content for the Websites.

21 **Response:**

22 Yudina objects to this Request to the extent it requests documents or things that
23 are already in Defendants' possession or are publicly available. Yudina also objects to
24 the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or
25 scope, and seeks information that is irrelevant to any party's claims or defenses or is
26 otherwise not reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 22:**

6 Produce all Documents constituting, evidencing, or relating to money exchanged
7 between or among Plaintiffs.

8 **Response:**

9 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
10 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
11 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
12 discovery of admissible evidence.

13 Subject to and without waiving any of the above objections, Yudina responds
14 that she will produce non-privileged, responsive documents within her possession,
15 custody, or control, if any.

16
17 **Request No. 23:**

18 Produce all Documents constituting, evidencing, or relating to information that
19 supports any statements contained in any article or posting made on the Websites.

20 **Response:**

21 Yudina objects to this Request to the extent it requests documents or things that
22 are already in Defendants' possession or are publicly available. Yudina also objects to
23 the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or
24 scope, and seeks information that is irrelevant to any party's claims or defenses or is
25 otherwise not reasonably calculated to lead to the discovery of admissible evidence.

26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 24:**

6 Produce all Documents constituting, evidencing, or relating to information that
7 contradicts any statements contained in any article or posting made on the Websites.

8 **Response:**

9 Yudina objects to this Request to the extent it requests documents or things that
10 are already in Defendants' possession or are publicly available. Yudina also objects to
11 the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or
12 scope, and seeks information that is irrelevant to any party's claims or defenses or is
13 otherwise not reasonably calculated to lead to the discovery of admissible evidence.

14 Subject to and without waiving any of the above objections, Yudina responds
15 that she will produce non-privileged, responsive documents within her possession,
16 custody, or control, if any.

17
18 **Request No. 25:**

19 Produce all invoices, bills, or receipts relating to the Websites.

20 **Response:**

21 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
22 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
23 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
24 discovery of admissible evidence.

25

26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 26:**

6 Produce all invoices, bills, or receipts relating to the Domains.

7 **Response:**

8 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
9 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
10 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
11 discovery of admissible evidence.

12 Subject to and without waiving any of the above objections, Yudina responds
13 that she will produce non-privileged, responsive documents within her possession,
14 custody, or control, if any.

15
16 **Request No. 27:**

17 Produce copies of each and every article, posting, or other Content that has ever
18 appeared on the Websites.

19 **Response:**

20 Yudina objects to this Request to the extent it requests documents or things that
21 are already in Defendants' possession or are publicly available. Yudina also objects to
22 the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or
23 scope, and seeks information that is irrelevant to any party's claims or defenses or is
24 otherwise not reasonably calculated to lead to the discovery of admissible evidence.

25
26

1 Subject to and without waiving any of the above objections, Yudina responds
2 that she will produce non-privileged, responsive documents within her possession,
3 custody, or control, if any.

4
5 **Request No. 28:**

6 Produce any Documents constituting, evidencing, or relating to the transfer or
7 any of the Domains or Websites.

8 **Response:**

9 Yudina objects to this Request to the extent it is overbroad, unduly burdensome,
10 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
11 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
12 discovery of admissible evidence.

13 Subject to and without waiving any of the above objections, Yudina responds
14 that she will produce non-privileged, responsive documents within her possession,
15 custody, or control, if any.

16
17 **Request No. 29:**

18 Produce all Documents supporting your assertion in paragraph 16 that, "[i]n
19 2014, the legally registered Disputed Domains were transferred to OST Group, who
20 became the registrant thereafter."

21 **Response:**

22 Yudina responds that she will produce non-privileged, responsive documents
23 within her possession, custody, or control, if any.

24

25

26

1 **Request No. 30:**

2 Produce all Documents that You intend to use or introduce at any deposition,
3 trial, hearing, mediation, arbitration or other proceeding in this matter.

4 **Response:**

5 Yudina objects to this Request to the extent it is premature. Discovery has only
6 recently begun and Yudina has not yet determined all of the Documents she intends to
7 introduce at any deposition, trial, hearing, mediation, arbitration or other proceeding in
8 this matter.

9 Subject to and without waiving any of the above objections, Yudina responds
10 that she will produce non-privileged, responsive documents within her possession,
11 custody, or control, if any.

12
13 **Request No. 31:**

14 Produce all Documents that You reviewed or relied upon in drafting your
15 responses to any Discovery Requests served by Defendants in the above-captioned
16 action, and/or Documents that otherwise support your responses.

17 **Response:**

18 Yudina objects to this Request to the extent it requests documents or things that
19 are protected by the attorney-client privilege and/or constitute attorney work product.

20 Subject to and without waiving any of the above objections, Yudina responds
21 that she will produce non-privileged, responsive documents within her possession,
22 custody, or control, if any.

23
24 **Request No. 32:**

25 Produce all Documents constituting or relating to any insurance policies held by
26 you that may offer coverage for any matter relating to this lawsuit.

1 **Response:**

2 Yudina responds that there are no applicable insurance policies held by her that
3 may offer coverage for matters relating to this lawsuit as pleaded.

4
5 **Request No. 33:**

6 For any expert You intend to call as a witness at the trial, arbitration, mediation
7 or other proceeding in this matter:

- 8 • A copy of the expert's curriculum vitae;
- 9 • A list of each article and/or report written by that expert;
- 10 • All Documents constituting, referring to, or relating to any opinions or
11 conclusions reached by that expert regarding this case;
- 12 • All Documents relied upon by Your expert witnesses in forming their
13 opinion(s)
- 14 • All Documents constituting, referring to, or relating to any
15 Communications between You and the expert; and
- 16 • A list of every case in which the expert was retained to testify, generated a
17 report, or otherwise provide expert advice since January 1, 2010.

18 **Response:**

19 Yudina objects to this Request as premature. Yudina has not yet retained any
20 experts in this case. If Yudina chooses to retain any experts, Yudina will supplement
21 this response as required under the Federal Rules of Civil Procedure and this Court's
22 scheduling and other applicable orders.

23
24 **Request No. 34:**

25 Produce all Documents identified or referenced in your Rule 26(a)(1)
26 disclosures.

1 **Response:**

2 Yudina responds that she will produce non-privileged documents identified or
3 referenced in the disclosures that are currently within her possession, custody, or
4 control.

5
6 **Request No. [sic] 34:**

7 Produce all articles or postings, regardless of whether they were publish or
8 posted, pertaining to Defendants.

9 **Response:**

10 Yudina objects to this Request to the extent it requests documents or things that
11 are already in Defendants' possession or are publicly available. Yudina also objects to
12 the extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or
13 scope, and seeks information that is irrelevant to any party's claims or defenses or is
14 otherwise not reasonably calculated to lead to the discovery of admissible evidence.

15 Subject to and without waiving any of the above objections, Yudina responds
16 that she will produce non-privileged, responsive documents within her possession,
17 custody, or control, if any.

18 DATED this 22nd day of November, 2016.

19
20
21 **Jaburg & Wilk, P.C.**

22
23 /s/Maria Crimi Speth

24 Maria Crimi Speth

25 Michael B. Dvoren

26 Aaron K. Haar

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Phoenix, AZ 85012

Attorneys for Plaintiffs/Counterdefendants

JABURG|WILK
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1 Copy of the foregoing
2 mailed and emailed this 22nd
3 day of November, 2016, to:

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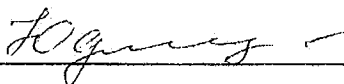
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/s/Debra Gower

Maria Crimi Speth
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VERIFICATION

I, Larissa Yudina, am a Plaintiff in the matter of **Yudina v. Kriss, Case No. 2:16-cv-00932-DJH**. I verify that I have read **Plaintiff Larissa Yudina's Responses to Defendant's First Set of Interrogatories** in this case and know the contents thereof. I hereby also verify that the matters stated within **Plaintiff Larissa Yudina's Responses to Defendant's First Set of Interrogatories** are true in substance and in fact.

DATED this 21 day of NOVEMBER, 2016.



Larissa Yudina

Original of the foregoing
mailed and emailed this 22d
day of November, 2016, to:

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Larissa Yudina, an individual; Felix
Sater, an individual; and OST Group, a
foreign entity;

Plaintiffs,

v.

Jody Kriss, an individual; and East River
Partners, LLC, a foreign corporation;

Defendants.

Case No. 2:16-cv-00932-DJH

**PLAINTIFF OST GROUP'S
RESPONSE TO DEFENDANTS'
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION**

Jody Kriss, an individual; and East River
Partners, LLC, a foreign corporation;

Counterclaimants,

v.

Larissa Yudina, an individual; Felix
Sater, an individual; and OST Group, a
foreign entity;

Counterdefendants,

Plaintiff/Counterdefendant OST Group ("OST") hereby responds to Defendants
First Set of Interrogatories and Requests for Production of Documents as follows:

INTERROGATORIES

Interrogatory No. 1:

Identify all Persons who registered, or assisted with the registration of, any of the Domains.

Answer:

OST responds that the Domains were registered by Felix Sater, Larissa Yudina, and Konstantin Yudin.

Interrogatory No. 2:

For each Person identified in the Answer to Interrogatory No. 1, list every domain registered by him or her.

Answer:

OST responds that the following Domains were registered by Felix Sater:

<jodykriss.com>,
<jodylkriss.com>,
<jodykriss.net>,
<jodylkriss.net>,
<jodykriss.org>,
<jodylkriss.org>,
<jodykriss.info>,
<jodylkriss.info>,
<krissjody.com>,
<jodykrisscrook.com>,
<jodykrissvorton.com>,
<vortonjodykriss.com>,
<jodykriss.co>.

OST responds that the following Domains were registered by Larissa Yudina:

<theeastriverpartners.com>
<eastriverpartnersllc.com>

1 <eastriverpartnersny.com>
2 <eastriverpartnersgroup.com>

3
4 OST responds that the following Domains were registered by either Felix Sater
5 or Larissa Yudina:

6 <eastriverpartners.net>
7 <eastriverpartners.info>

8
9 **Interrogatory No. 3:**

10 Identify all Persons who contributed financially to registration, creation, or
11 Maintenance of the domains or websites.

12 **Answer:**

13 OST objects to this Interrogatory to the extent it is overbroad, unduly
14 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
15 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
16 lead to the discovery of admissible evidence.

17 Subject to and without waiving any of the above objections, OST responds that
18 Felix Sater, Larissa Yudina, and Konstantin Yudin contributed financially.

19
20 **Interrogatory No. 4:**

21 Identify all email addresses that You, any of the other Plaintiffs, or anyone acting
22 on Your or their behalf, have used for communications relating to the Domains or
23 Websites.

24 **Answer:**

25 OST objects to this Interrogatory to the extent it is overbroad, unduly
26 burdensome, lacks specificity as to relevant time or scope, and seeks information that is

1 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
2 lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds that
4 Felix Sater, Larissa Yudina, and Konstantin Yudin have used the following email
5 addresses: felix@regency.net, felixsater@gmail.com, and kyudin@gmail.com.
6

7 **Interrogatory No. 5:**

8 Identify all Persons who authored or created original Content that appeared on
9 the Websites.

10 **Answer:**

11 OST objects to this Interrogatory to the extent it is overbroad, unduly
12 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
13 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
14 lead to the discovery of admissible evidence.

15 Subject to and without waiving any of the above objections, OST responds that
16 Felix Sater, Larissa Yudina, and Konstantin Yudin contributed to the creation of
17 content. All information was provided by the news or article sources credited on one or
18 more of the websites for any included news stories or articles therein.
19

20 **Interrogatory No. 6:**

21 Identify all Persons who provided any other information that appeared on the
22 Websites.

23 **Answer:**

24 OST objects to this Interrogatory to the extent it is overbroad, unduly
25 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
26

1 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
2 lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds as
4 follows: See response to Interrogatory No. 5 above. All information was provided by
5 the news or article sources credited on one or more of the websites for any included
6 news stories or articles therein.

7
8 **Interrogatory No. 7:**

9 Identify the Person(s) responsible for publishing each piece of content that
10 currently exists or has ever existed on each of the Websites from the time each Website
11 was created until April 4, 2016.

12 **Answer:**

13 OST objects to this Interrogatory to the extent it is overbroad, unduly
14 burdensome, lacks specificity as to relevant scope, and seeks information that is
15 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
16 lead to the discovery of admissible evidence.

17 Subject to and without waiving any of the above objections, OST responds that
18 Felix Sater, Larissa Yudina, and Konstantin Yudin were responsible for publishing
19 content.

20
21 **Interrogatory No. 8:**

22 Identify who currently maintains each of the Websites.

23 **Answer:**

24 OST objects to this Interrogatory to the extent it is overbroad, unduly
25 burdensome, vague and ambiguous with respect to the word "maintains," and seeks
26

1 information that is irrelevant to any party's claims or defenses or is otherwise not
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds that
4 Larissa Yudina and Konstantin Yudin maintain the Websites.

5
6 **Interrogatory No. 9:**

7 Identify who currently owns each of the Domains.

8 **Answer:**

9 OST responds that the Domains are owned by OST Group.
10

11 **Interrogatory No. 10:**

12 For any of the Domains previously owned by someone other than You, identify
13 the date(s) that You acquired ownership (including the name of each domain and from
14 whom each domain was acquired on the particular date(s)).

15 **Answer:**

16 OST responds that it acquired ownership of domains from Felix Sater and
17 Larissa Yudina in about 2014 but does not have historical data on acquisition or transfer
18 dates.
19

20 **Interrogatory No. 11:**

21 Identify all Persons who have ever been responsible for the Maintenance of the
22 Websites.

23 **Answer:**

24 OST objects to this Interrogatory to the extent it is overbroad, unduly
25 burdensome, vague and ambiguous with respect to the word "maintains," and seeks
26

1 information that is irrelevant to any party's claims or defenses or is otherwise not
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds that
4 OST, Felix Sater, Larissa Yudina, and Konstantin Yudin have been responsible for
5 maintenance.

6
7 **Interrogatory No. 12:**

8 For each Person identified in the answer to Interrogatory No. 11, list the dates of
9 their involvement.

10 **Answer:**

11 Subject to and without waiving any of the objections to Interrogatory No. 11
12 above, OST responds that OST, Felix Sater, Larissa Yudina, and Konstantin Yudin have
13 all been involved from the beginning.

14
15 **Interrogatory No. 13:**

16 Describe Your relationship with or connection to plaintiff Larissa Yudina.

17 **Answer:**

18 OST responds that Larissa Yudina is the owner of OST.

19
20 **Interrogatory No. 14:**

21 Describe Your relationship with or connection to plaintiff Felix Sater.

22 **Answer:**

23 OST responds that it has a historic and current business relationship with plaintiff
24 Felix Sater to provide internet marketing services.

1 **Interrogatory No. 15:**

2 Describe Your relationship with or connection to Konstantin Yudin.

3 **Answer:**

4 OST responds that Konstantin Yudin is an employee of OST Group.

6 **Interrogatory No. 16:**

7 State when You first became aware of defendant Jody Kriss.

8 **Answer:**

9 OST responds that it first become aware of defendant Jody Kriss as early as
10 2005.

12 **Interrogatory No. 17:**

13 State when you first became aware of defendant East River Partners, LLC.

14 **Answer:**

15 OST responds that it first become aware of defendant East River Partners, LLC
16 as early as 2005.

18 **Interrogatory No. 18:**

19 Identify any or all addresses at which You have resided since 2010, including
20 Your present address.

21 **Answer:**

22 OST objects to this Interrogatory to the extent it is overbroad, unduly
23 burdensome, and seeks information that is irrelevant to any party's claims or defenses or
24 is otherwise not reasonably calculated to lead to the discovery of admissible evidence.

25

26

1 Subject to and without waiving any of the above objections, OST responds that
2 its current business address is Krylatskye Holmy 32 Corpus 1, apt 66, Moscow 121614,
3 Russia.

4
5 **Interrogatory No. 19:**

6 Identify any agreements, written or oral, between You and any of the other
7 Plaintiffs.

8 **Answer:**

9 OST objects to this Interrogatory to the extent it is overbroad, unduly
10 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
11 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
12 lead to the discovery of admissible evidence.

13 Subject to and without waiving any of the above objections, OST responds that
14 OST has an oral agreement to provide internet marketing services to Felix Sater.

15
16 **Interrogatory No. 20:**

17 Identify all employees, officers, independent contractors, and principals of OST
18 Group.

19 **Answer:**

20 OST objects to this Interrogatory to the extent it is overbroad, unduly
21 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
22 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
23 lead to the discovery of admissible evidence.

24 Subject to and without waiving any of the above objections, OST responds that
25 this information is confidential and would be contrary to Russian law to disclose or
26 violate the confidentiality agreements.

1 **Interrogatory No. 21:**

2 Describe in detail OST Group's connection to or presence in New York state.

3 **Answer:**

4 OST objects to this Interrogatory to the extent it is overbroad, unduly
5 burdensome, lacks specificity as to relevant time or scope, and seeks information that is
6 irrelevant to any party's claims or defenses or is otherwise not reasonably calculated to
7 lead to the discovery of admissible evidence.

8 Subject to and without waiving any of the above objections, OST responds that it
9 maintains a business mailing address in New York.

10

11

REQUESTS FOR DOCUMENTS

12 **Request No. 1:**

13 Produce all Content that was ever posted or published on each of the Websites.

14 **Response:**

15 OST objects to this Request to the extent it requests documents or things that are
16 already in Defendants' possession or are publicly available. OST also objects to the
17 extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope,
18 and seeks information that is irrelevant to any party's claims or defenses or is otherwise
19 not reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiving any of the above objections, OST responds that it
21 will produce non-privileged, responsive documents within its possession, custody, or
22 control, if any.

23

24 **Request No. 2:**

25 Produce all Communications between You and plaintiff Larissa Yudina, or
26 anyone acting on her behalf, relating to the Websites or their Content.

1 **Response:**

2 OST objects to this Request to the extent it requests documents or things that are
3 protected by the attorney-client privilege and/or constitute attorney work product. OST
4 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
5 relevant time or scope, and seeks information that is irrelevant to any party's claims or
6 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Subject to and without waiving any of the above objections, OST responds that it
9 will produce non-privileged, responsive documents within its possession, custody, or
10 control, if any.

11
12 **Request No. 3:**

13 Produce all Communications between You and plaintiff Larissa Yudina, or
14 anyone acting on her behalf, relating to the Domains.

15 **Response:**

16 OST objects to this Request to the extent it requests documents or things that are
17 protected by the attorney-client privilege and/or constitute attorney work product. OST
18 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
19 relevant time or scope, and seeks information that is irrelevant to any party's claims or
20 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiving any of the above objections, OST responds that it
23 will produce non-privileged, responsive documents within its possession, custody, or
24 control, if any.

25

26

1 **Request No. 4:**

2 Produce all Communications between You and plaintiff OST Group, or anyone
3 acting on its behalf, relating to the Websites or their Content.

4 **Response:**

5 OST assumes that Defendants intended to write “plaintiff Felix Sater” but
6 inadvertently wrote “plaintiff OST Group.” If so, Plaintiff objects to this Request to the
7 extent it requests documents or things that are protected by the attorney-client privilege
8 and/or constitute attorney work product. OST also objects to the extent it is overbroad,
9 unduly burdensome, lacks specificity as to relevant time or scope, and seeks information
10 that is irrelevant to any party’s claims or defenses or is otherwise not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiving any of the above objections, OST responds that it
13 will produce non-privileged, responsive documents within its possession, custody, or
14 control, if any.

15
16 **Request No. 5:**

17 Produce all Communications between You and plaintiff OST Group, or anyone
18 acting on its behalf, relating to the Domains.

19 **Response:**

20 OST assumes that Defendants intended to write “plaintiff Felix Sater” but
21 inadvertently wrote “plaintiff OST Group.” If so, OST objects to this Request to the
22 extent it requests documents or things that are protected by the attorney-client privilege
23 and/or constitute attorney work product. OST also objects to the extent it is overbroad,
24 unduly burdensome, lacks specificity as to relevant time or scope, and seeks information
25 that is irrelevant to any party’s claims or defenses or is otherwise not reasonably
26 calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving any of the above objections, OST responds that it
2 will produce non-privileged, responsive documents within its possession, custody, or
3 control, if any.

4
5 **Request No. 6:**

6 Produce all Communications between You and Konstantin Yudin, or anyone
7 acting on his behalf, relating to the Websites or their Content.

8 **Response:**

9 OST objects to this Request to the extent it requests documents or things that are
10 protected by the attorney-client privilege and/or constitute attorney work product. OST
11 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
12 relevant time or scope, and seeks information that is irrelevant to any party's claims or
13 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
14 evidence.

15 Subject to and without waiving any of the above objections, OST responds that it
16 will produce non-privileged, responsive documents within its possession, custody, or
17 control, if any.

18
19 **Request No. 7:**

20 Produce all Communications between You and Konstantin Yudin, or anyone
21 acting on his behalf, relating to the Domains.

22 **Response:**

23 OST objects to this Request to the extent it requests documents or things that are
24 protected by the attorney-client privilege and/or constitute attorney work product. OST
25 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
26 relevant time or scope, and seeks information that is irrelevant to any party's claims or

1 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiving any of the above objections, OST responds that it
4 will produce non-privileged, responsive documents within its possession, custody, or
5 control, if any.

6
7 **Request No. 8:**

8 Produce all Communications between You and any other Person relating to the
9 Websites or their Content.

10 **Response:**

11 OST objects to this Request to the extent it requests documents or things that are
12 protected by the attorney-client privilege and/or constitute attorney work product. OST
13 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
14 relevant time or scope, and seeks information that is irrelevant to any party's claims or
15 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiving any of the above objections, OST responds that it
18 will produce non-privileged, responsive documents within its possession, custody, or
19 control, if any.

20
21 **Request No. 9:**

22 Produce all Communications between You and any other Person relating to the
23 Domains.

24 **Response:**

25 OST objects to this Request to the extent it requests documents or things that are
26 protected by the attorney-client privilege and/or constitute attorney work product. OST

1 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
2 relevant time or scope, and seeks information that is irrelevant to any party's claims or
3 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiving any of the above objections, OST responds that it
6 will produce non-privileged, responsive documents within its possession, custody, or
7 control, if any.

8
9 **Request No. 10:**

10 Produce all other Communications relating to the Websites or their Content.

11 **Response:**

12 OST objects to this Request to the extent it requests documents or things that are
13 protected by the attorney-client privilege and/or constitute attorney work product. OST
14 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
15 relevant time or scope, and seeks information that is irrelevant to any party's claims or
16 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Subject to and without waiving any of the above objections, OST responds that it
19 will produce non-privileged, responsive documents within its possession, custody, or
20 control, if any.

21
22 **Request No. 11:**

23 Produce all other Communications relating to the Domains.

24 **Response:**

25 OST objects to this Request to the extent it requests documents or things that are
26 protected by the attorney-client privilege and/or constitute attorney work product. OST

1 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
2 relevant time or scope, and seeks information that is irrelevant to any party's claims or
3 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiving any of the above objections, OST responds that it
6 will produce non-privileged, responsive documents within its possession, custody, or
7 control, if any.

8
9 **Request No. 12:**

10 Produce all Documents relating to the Domains.

11 **Response:**

12 OST objects to this Request to the extent it requests documents or things that are
13 protected by the attorney-client privilege and/or constitute attorney work product. OST
14 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
15 relevant time or scope, and seeks information that is irrelevant to any party's claims or
16 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Subject to and without waiving any of the above objections, OST responds that it
19 will produce non-privileged, responsive documents within its possession, custody, or
20 control, if any.

21
22 **Request No. 13:**

23 Produce all Communications with or relating to GoDaddy pertaining to the
24 Websites or Domains.

1 **Response:**

2 OST objects to this Request to the extent it is overbroad, unduly burdensome,
3 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
4 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
5 discovery of admissible evidence.

6 Subject to and without waiving any of the above objections, OST responds that it
7 will produce non-privileged, responsive documents within its possession, custody, or
8 control, if any.

9
10 **Request No. 14:**

11 Produce all Documents from GoDaddy relating to the Websites or Domains.

12 **Response:**

13 OST objects to this Request to the extent it is overbroad, unduly burdensome,
14 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
15 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
16 discovery of admissible evidence.

17 Subject to and without waiving any of the above objections, OST responds that it
18 will produce non-privileged, responsive documents within its possession, custody, or
19 control, if any.

20
21 **Request No. 15:**

22 Produce all Communications with Domains By Proxy relating to the Domains.

23 **Response:**

24 OST objects to this Request to the extent it is overbroad, unduly burdensome,
25 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
26

1 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
2 discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds that it
4 will produce non-privileged, responsive documents within its possession, custody, or
5 control, if any.

6
7 **Request No. 16:**

8 Produce all Documents provided to you by Domains By Proxy.

9 **Response:**

10 OST objects to this Request to the extent it is overbroad, unduly burdensome,
11 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
12 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
13 discovery of admissible evidence.

14 Subject to and without waiving any of the above objections, OST responds that it
15 will produce non-privileged, responsive documents within its possession, custody, or
16 control, if any.

17
18 **Request No. 17:**

19 Produce all Documents and Communications constituting, evidencing, or relating
20 to advertisements or offers pertaining to creation of content for the Websites or content
21 related to Defendants.

22 **Response:**

23 OST objects to this Request to the extent it requests documents or things that are
24 publicly available. OST also objects to the extent it is overbroad, unduly burdensome,
25 lacks specificity as to relevant time or scope, is vague and ambiguous with respect to the
26 phrase "advertisements or offers pertaining to creation of content," and seeks

1 information that is irrelevant to any party's claims or defenses or is otherwise not
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving any of the above objections, OST responds that it
4 will produce non-privileged, responsive documents within its possession, custody, or
5 control, if any.

6
7 **Request No. 18:**

8 Produce all Communications between or among Plaintiffs referring to,
9 mentioning, or otherwise relating to Defendants.

10 **Response:**

11 OST objects to this Request to the extent it requests documents or things that are
12 protected by the attorney-client privilege and/or constitute attorney work product. OST
13 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
14 relevant time or scope, and seeks information that is irrelevant to any party's claims or
15 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiving any of the above objections, OST responds that it
18 will produce non-privileged, responsive documents within its possession, custody, or
19 control, if any.

20
21 **Request No. 19:**

22 Produce all Documents referring to, mentioning, or otherwise relating to
23 Defendants.

24 **Response:**

25 OST objects to this Request to the extent it requests documents or things that are
26 protected by the attorney-client privilege and/or constitute attorney work product. OST

1 also objects to the extent it requests documents or things that are already in Defendants'
2 possession or are publicly available. OST further objects to the extent it is overbroad,
3 unduly burdensome, lacks specificity as to relevant time or scope, and seeks information
4 that is irrelevant to any party's claims or defenses or is otherwise not reasonably
5 calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiving any of the above objections, OST responds that it
7 will produce non-privileged, responsive documents within its possession, custody, or
8 control, if any.

9
10 **Request No. 20:**

11 Produce all Communications between You and any other Persons referring to,
12 mentioning, or otherwise relating to Defendants.

13 **Response:**

14 OST objects to this Request to the extent it requests documents or things that are
15 protected by the attorney-client privilege and/or constitute attorney work product. OST
16 also objects to the extent it is overbroad, unduly burdensome, lacks specificity as to
17 relevant time or scope, and seeks information that is irrelevant to any party's claims or
18 defenses or is otherwise not reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Subject to and without waiving any of the above objections, OST responds that it
21 will produce non-privileged, responsive documents within its possession, custody, or
22 control, if any.

23
24 **Request No. 21:**

25 Produce all Documents constituting, evidencing, or relating to content for the Websites.

26

1 **Response:**

2 OST objects to this Request to the extent it requests documents or things that are
3 already in Defendants' possession or are publicly available. OST also objects to the
4 extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope,
5 and seeks information that is irrelevant to any party's claims or defenses or is otherwise
6 not reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to and without waiving any of the above objections, OST responds that it
8 will produce non-privileged, responsive documents within its possession, custody, or
9 control, if any.

10
11 **Request No. 22:**

12 Produce all Documents constituting, evidencing, or relating to money exchanged
13 between or among Plaintiffs.

14 **Response:**

15 OST objects to this Request to the extent it is overbroad, unduly burdensome,
16 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
17 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
18 discovery of admissible evidence.

19 Subject to and without waiving any of the above objections, OST responds that
20 she will produce non-privileged, responsive documents within her possession, custody,
21 or control, if any.

22
23 **Request No. 23:**

24 Produce all Documents constituting, evidencing, or relating to information that
25 supports any statements contained in any article or posting made on the Websites.

26

1 **Response:**

2 OST objects to this Request to the extent it requests documents or things that are
3 already in Defendants' possession or are publicly available. OST also objects to the
4 extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope,
5 and seeks information that is irrelevant to any party's claims or defenses or is otherwise
6 not reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to and without waiving any of the above objections, OST responds that it
8 will produce non-privileged, responsive documents within its possession, custody, or
9 control, if any.

10
11 **Request No. 24:**

12 Produce all Documents constituting, evidencing, or relating to information that
13 contradicts any statements contained in any article or posting made on the Websites.

14 **Response:**

15 OST objects to this Request to the extent it requests documents or things that are
16 already in Defendants' possession or are publicly available. OST also objects to the
17 extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope,
18 and seeks information that is irrelevant to any party's claims or defenses or is otherwise
19 not reasonably calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiving any of the above objections, OST responds that it
21 will produce non-privileged, responsive documents within its possession, custody, or
22 control, if any.

23
24 **Request No. 25:**

25 Produce all invoices, bills, or receipts relating to the Websites.

26

1 **Response:**

2 OST objects to this Request to the extent it is overbroad, unduly burdensome,
3 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
4 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
5 discovery of admissible evidence.

6 Subject to and without waiving any of the above objections, OST responds that it
7 will produce non-privileged, responsive documents within its possession, custody, or
8 control, if any.

9
10 **Request No. 26:**

11 Produce all invoices, bills, or receipts relating to the Domains.

12 **Response:**

13 OST objects to this Request to the extent it is overbroad, unduly burdensome,
14 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
15 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
16 discovery of admissible evidence.

17 Subject to and without waiving any of the above objections, OST responds that it
18 will produce non-privileged, responsive documents within its possession, custody, or
19 control, if any.

20
21 **Request No. 27:**

22 Produce copies of each and every article, posting, or other Content that has ever
23 appeared on the Websites.

24 **Response:**

25 OST objects to this Request to the extent it requests documents or things that are
26 already in Defendants' possession or are publicly available. OST also objects to the

1 extent it is overbroad, unduly burdensome, lacks specificity as to relevant time or scope,
2 and seeks information that is irrelevant to any party's claims or defenses or is otherwise
3 not reasonably calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiving any of the above objections, OST responds that it
5 will produce non-privileged, responsive documents within its possession, custody, or
6 control, if any.

7
8 **Request No. 28:**

9 Produce any Documents constituting, evidencing, or relating to the transfer or
10 any of the Domains or Websites.

11 **Response:**

12 OST objects to this Request to the extent it is overbroad, unduly burdensome,
13 lacks specificity as to relevant time or scope, and seeks information that is irrelevant to
14 any party's claims or defenses or is otherwise not reasonably calculated to lead to the
15 discovery of admissible evidence.

16 Subject to and without waiving any of the above objections, OST responds that it
17 will produce non-privileged, responsive documents within its possession, custody, or
18 control, if any.

19
20 **Request No. 29:**

21 Produce all Documents supporting your assertion in paragraph 16 that, "[i]n
22 2014, the legally registered Disputed Domains were transferred to OST Group, who
23 became the registrant thereafter."

24 **Response:**

25 OST responds that it will produce non-privileged, responsive documents within
26 its possession, custody, or control, if any

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Request No. 30:

Produce all Documents that You intend to use or introduce at any deposition, trial, hearing, mediation, arbitration or other proceeding in this matter.

Response:

OST objects to this Request to the extent it is premature. Discovery has only recently begun and OST has not yet determined all of the Documents she intends to introduce at any deposition, trial, hearing, mediation, arbitration or other proceeding in this matter.

Subject to and without waiving any of the above objections, OST responds that it will produce non-privileged, responsive documents within its possession, custody, or control, if any.

Request No. 31:

Produce all Documents that You reviewed or relied upon in drafting your responses to any Discovery Requests served by Defendants in the above-captioned action, and/or Documents that otherwise support your responses.

Response:

OST objects to this Request to the extent it requests documents or things that are protected by the attorney-client privilege and/or constitute attorney work product.

Subject to and without waiving any of the above objections, OST responds that it will produce non-privileged, responsive documents within its possession, custody, or control, if any.

1 **Request No. 32:**

2 Produce all Documents constituting or relating to any insurance policies held by
3 you that may offer coverage for any matter relating to this lawsuit.

4 **Response:**

5 OST responds that there are no applicable insurance policies held by it that may
6 offer coverage for matters relating to this lawsuit as pleaded.

7
8 **Request No. 33:**

9 For any expert You intend to call as a witness at the trial, arbitration, mediation
10 or other proceeding in this matter:

- 11 • A copy of the expert's curriculum vitae;
- 12 • A list of each article and/or report written by that expert;
- 13 • All Documents constituting, referring to, or relating to any opinions or
14 conclusions reached by that expert regarding this case;
- 15 • All Documents relied upon by Your expert witnesses in forming their
16 opinion(s)
- 17 • All Documents constituting, referring to, or relating to any
18 Communications between You and the expert; and
- 19 • A list of every case in which the expert was retained to testify, generated a
20 report, or otherwise provide expert advice since January 1, 2010.

21 **Response:**

22 OST objects to this Request as premature. OST has not yet retained any experts
23 in this case. If OST chooses to retain any experts, OST will supplement this response as
24 required under the Federal Rules of Civil Procedure and this Court's scheduling and
25 other applicable orders.

26

1 **Request No. 34:**

2 Produce all Documents identified or referenced in your Rule 26(a)(1)
3 disclosures.

4 **Response:**

5 OST responds that it will produce non-privileged documents identified or
6 referenced in the disclosures that are currently within its possession, custody, or control.

7
8 DATED this 22nd day of November, 2016.

9
10 **Jaburg & Wilk, P.C.**

11
12 /s/Maria Crimi Speth

13 Maria Crimi Speth

14 Michael B. Dvoren

15 Aaron K. Haar

16 3200 N. Central Avenue, 20th Floor

17 Phoenix, AZ 85012

18 *Attorneys for Plaintiffs/Counterdefendants*

19 Copy of the foregoing
20 mailed and emailed this 22nd
day of November, 2016, to:

21 Gregory B. Collins

22 KERCSMAR & FELTUS PLLC

23 7150 East Camelback Road, Suite 285

24 Scottsdale, Arizona 85251

25 gbc@kflawaz.com

26

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Attorneys at Law

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6 acsherman@vorys.com
7 *Attorneys for Defendants/Counterclaimants*

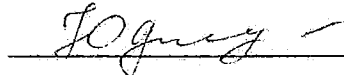
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/s/Debra Gower

Maria Crimi Speth
Michael B. Dvoren
Aaron K. Haar
3200 N. Central Avenue, 20th Floor
Phoenix, AZ 85012
Attorneys for
Plaintiffs/Counterdefendants

VERIFICATION

I, Larissa Yudina, am the owner of OST Group, which is a Plaintiff in the matter of **Yudina v. Kriss, Case No. 2:16-cv-00932-DJH**. I verify that I have read **Plaintiff OST Group's Responses to Defendant's First Set of Interrogatories** in this case and know the contents thereof. I hereby also verify that the matters stated within **Plaintiff OST Group's Responses to Defendant's First Set of Interrogatories** are true in substance and in fact.

DATED this 21 day of NOVEMBER, 2016.



—
Larissa Yudina, on behalf of OST
Group

Original of the foregoing
mailed and emailed this 22d
day of November, 2016, to:

Gregory B. Collins
KERCSMAR & FELTUS PLLC
7150 East Camelback Road, Suite 285
Scottsdale, Arizona 85251

EXHIBIT 6



WHOIS

DOMAINS HOSTING CLOUD ^{NEW} WEBSITES EMAIL SECURITY WHOIS SUPPORT LOGIN 0

jodykriss.today

Updated 2 hours ago ↺

DOMAIN INFORMATION

Domain: jodykriss.today
 Registration Date: 2016-06-25
 Expiration Date: 2017-06-25
 Updated Date: 2017-01-06
 Status: clientDeleteProhibited
 clientRenewProhibited
 clientTransferProhibited
 clientUpdateProhibited
 Name Servers: ns14.domaincontrol.com
 ns13.domaincontrol.com

.website

~~\$21.88~~ \$1.48

BUY NOW

*Offer ends on 28th February UTC

REGISTRANT CONTACT

Name: Larissa Yudina
 Street: 565 Plandome Road Suite 144
 City: Manhasset
 State: NY
 Postal Code: 11030
 Country: US
 Phone: +1.9857878747
 Email: kyudin11@gmail.com

Hot Deals!



.IN @ \$3.88 \$9.88

ADMINISTRATIVE CONTACT

Name: Larissa Yudina
 Street: 565 Plandome Road Suite 144
 City: Manhasset
 State: NY
 Postal Code: 11030
 Country: US
 Phone: +1.9857878747
 Email: kyudin11@gmail.com

TECHNICAL CONTACT

Name: Larissa Yudina
 Street: 565 Plandome Road Suite 144
 City: Manhasset
 State: NY
 Postal Code: 11030
 Country: US
 Phone: +1.9857878747
 Email: kyudin11@gmail.com

RAW WHOIS DATA

Domain Name: jodykriss.today
 Registry Domain ID: 428649e19f704b3fbc3e04608b1875b2-DONUTS
 Registrar WHOIS Server: who.godaddy.com/
 Registrar URL: http://www.godaddy.com/domains/search.aspx?ci=8990
 Updated Date: 2017-01-06T00:59:18Z
 Creation Date: 2016-06-25T11:31:59Z
 Registry Expiry Date: 2017-06-25T11:31:59Z
 Registrar: GoDaddy.com, LLC
 Registrar IANA ID: 146
 Registrar Abuse Contact Email: abuse@godaddy.com
 Registrar Abuse Contact Phone: +1.4806242505
 Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited

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Domain Status: clientRenewProhibited <https://icann.org/epp#clientRenewProhibited>
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Domain Status: clientUpdateProhibited <https://icann.org/epp#clientUpdateProhibited>
Registry Registrant ID: 400cb014ccf34cefb3ed86029b25d780-DONUTS
Registrant Name: Larissa Yudina
Registrant Organization:
Registrant Street: 565 Plandome Road Suite 144
Registrant City: Manhasset
Registrant State/Province: NY
Registrant Postal Code: 11030
Registrant Country: US
Registrant Phone: +1.9857878747
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: kyudin11@gmail.com
Registry Admin ID: 5276924a2276406495302932a20c8c35-DONUTS
Admin Name: Larissa Yudina
Admin Organization:
Admin Street: 565 Plandome Road Suite 144
Admin City: Manhasset
Admin State/Province: NY
Admin Postal Code: 11030
Admin Country: US
Admin Phone: +1.9857878747
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: kyudin11@gmail.com
Registry Tech ID: e608e2ff4bf84168be50b64e39fb8d55-DONUTS
Tech Name: Larissa Yudina
Tech Organization:
Tech Street: 565 Plandome Road Suite 144
Tech City: Manhasset
Tech State/Province: NY
Tech Postal Code: 11030
Tech Country: US
Tech Phone: +1.9857878747
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: kyudin11@gmail.com
Name Server: ns14.domaincontrol.com
Name Server: ns13.domaincontrol.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>
>>> Last update of WHOIS database: 2017-02-09T11:14:59Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

Terms of Use: Users accessing the Donuts WHOIS service must agree to use the data only for lawful purposes, and under no circumstances use the data to: Allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the registrar's own existing customers. Enable high volume, automated, electronic processes that send queries or data to the systems of Donuts or any ICANN-accredited registrar, except as reasonably necessary to register domain names or modify existing registrations. When using the Donuts Whois service, please consider the following: The Whois service is not a replacement for standard EPP commands to the SRS service. Whois is not considered authoritative for registered domain objects. The Whois service may be scheduled for downtime during production or OT&E maintenance periods. Queries to the Whois services are throttled. If too many queries are received from a single IP address within a specified time, the service will begin to reject further queries for a period of time to prevent disruption of Whois service access.

related domain names


[godaddy.com](#) [icann.org](#) [gmail.com](#) [domaincontrol.com](#)

Domains

[Register Domain Name](#)
[View Domain Pricing](#)
[Bulk Domain Register](#)
[Bulk Domain Transfer](#)
[Whois Lookup](#)
[Name Suggestion Tool](#)

Hosting & Products

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[Windows Hosting](#)
[Linux Reseller Hosting](#)
[Windows Reseller Hosting](#)
[Virtual Private Servers](#)
[Dedicated Servers](#)

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Enter a Domain Name

Free with Every Domain

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Business Email

Enterprise Email

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Sitelock

Codeguard

Support

View Knowledge Base

Contact Support

Report Abuse

About Whois

LOGIN

OR

CREATE AN ACCOUNT



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EXHIBIT 7

IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

JODY L. KRISS, : CASE NO. A1502350
Plaintiff, : JUDGE MEGAN SHANAHAN
vs. :
REVIEWER 1, et al., : AFFIDAVIT OF KONSTANTIN YUDIN
Defendants. :

Russian Federation :
Moscow Oblast : SS.
City of Moscow :

KONSTANTIN YUDIN, being duly sworn according to law, states as follows:

1. I am an owner and manager of Unnamed Defendant, OST Group ("OST") in the above captioned action.
2. I am over the age of 18 and am competent to make this affidavit.
3. I have personal knowledge of the matters stated herein.
4. OST is a Russian corporation. A true and accurate copy of OST's Articles of Incorporation is attached as Exhibit "A."
5. OST is an Internet marketing and consulting firm with its principal place of business in Moscow, Russian Federation.
6. OST maintains a presence in Manhasset, New York.
7. OST does not have any physical presence in Ohio.
8. OST does not have any customers in Ohio.
9. OST has never contracted to supply services or goods in Ohio.
10. OST does not derive any revenue from Ohio.

11. OST does not have an interest in real property in Ohio.
12. OST does not contract to insure any persons or property in Ohio.
13. OST is not licensed to do business in Ohio.
14. OST does not have any agent for service of process in Ohio.
15. OST does not solicit business in Ohio through a local office or agents.
16. OST does not send agents into Ohio on a regular basis to solicit business.
17. OST does not have a bank account in Ohio.
18. OST does not advertise in Ohio.

19. Plaintiff, Jody L. Kriss ("Plaintiff") is a resident of New York. He is a commercial real estate developer who, to the best of my knowledge, primarily conducts business in the state of New York and the New York City metropolitan area.

20. Plaintiff has been a party in significant litigation in New York state and federal courts relating to his past business transactions as an executive and co-founder of BayRock Group, LLC, and later as an executive at East River Partners, LLC.

21. OST is the owner of and maintains the following domain names: eastriverpartnersny.com, jodykriss.com, jodykriss.info, jodykriss.org, jodykriss.net, theeastriverpartners.com, jodylkriss.net, eastriverpartners.info, eastriverpartnersllc.com, jodylkriss.org, jodylkriss.info, jodylkriss.com, and eastriverpartners.net.

22. OST is the re-publisher of all "reviews" from the above websites, and is also the original poster of several other "reviews" described in Plaintiff's Complaint (the "Posts").

23. The Posts report and comment on several lawsuits filed by and against Plaintiff in New York state and federal courts.

24. The Posts specifically report and comment on allegations made against Plaintiff in certain lawsuits, including allegations that Plaintiff is a serial litigator and has close connections with criminal organizations.

25. The lawsuits which the Posts comment and report on include:

- *Kriss v. BayRock Group, LLC*, Supreme Court of New York, County of New York, Case No. 651715-2013. A true and accurate copy of the complaint is attached as Exhibit "B."
- *Kriss v. Lombardi*, Supreme Court of New York, County of Queens, Case No. 701759-2014. A true and accurate copy of the complaint is attached as Exhibit "C."
- *Kriss v. BayRock Group, LLC*, United States District Court, Southern District of New York, Case No. 1:10-cv-03959-LGS-FM. A true and accurate copy of the most recent decision and order is attached as Exhibit "D."
- *Lauria v. Kriss*, Supreme Court of New York, County of New York, Case No. 152324-2014. A true and accurate copy of the complaint is attached as Exhibit "E."
- *Estate of Ernest Gottdiener v. Sater*, United States District Court, Southern District of New York, Case No. 1:13-cv-01824-LGS. A true and accurate copy of the complaint is attached as Exhibit "F."
- *Brun v. ERP Park Slope, LLC*, Supreme Court of New York, County of New York, Case No. 158668-2014. A true and accurate copy of the complaint is attached as Exhibit "G."

26. A true and accurate copy of a New York Post article dated March 16, 2014 and titled "Mob rat says Ivy League business partner tried to whack him" is attached as Exhibit "H."

27. A true and accurate copy of an article reported by the Associated Press dated December 4, 2015 and titled "Misconduct allegations follow Trump associate with mob past" is attached as Exhibit "I."

28. None of the Posts refer or relate to any business which Plaintiff allegedly conducts in Ohio.

29. None of the Posts specifically refer to or are directed towards any Ohio residents, businesses, or entities.

30. None of the Posts were made for the purpose of advertising, selling products or services, or otherwise engaging in any sort of commercial activity.

31. OST never received any notification of the pendency of the above captioned action until late December 2015.

32. When OST discovered the existence of the order issued by the Hamilton County Court of Common Pleas in December 2015, OST attempted to have Google re-index the Posts. OST's efforts were unsuccessful.

33. OST never received any summons, complaint or other form of service of process for the above captioned action.

[Remainder of page is intentionally left blank]

Further Affiant sayeth naught.


 KONSTANTIN YUDIN

SWORN TO BEFORE ME and subscribed in my presence this _____ day of

_____, 2016.

 Notary Public

APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Страна Российская Федерация
2. был подписан (фамилия) Щеткин Е. В.
3. выступавший в качестве нотариуса г. Москвы
4. скреплен печатью / штампом (название учреждения)
 нотариальная контора г. Москвы
5. в г. Москве 6. (дата) 15.03.2016
7. (название государственного органа) нотариальная контора г. Москвы
8. (подпись) Щеткин Е. В.



EXHIBIT 8



WHOIS

DOMAINS

HOSTING

CLOUD ^{NEW}

WEBSITES

EMAIL

SECURITY

WHOIS

SUPPORT

LOGIN

0

jodykriss.com

Updated 9 hours ago ↻

DOMAIN INFORMATION

Domain: jodykriss.com
 Registrar: GODADDY.COM, LLC
 Registration Date: 2012-07-10
 Expiration Date: 2017-07-10
 Updated Date: 2016-07-11
 Status: clientDeleteProhibited
 clientRenewProhibited
 clientTransferProhibited
 clientUpdateProhibited
 Name Servers: ns13.domaincontrol.com
 ns14.domaincontrol.com

.website\$21.88 **\$1.48**

BUY NOW

*Offer ends on 28th February UTC

Hot Deals!**.ME @ \$4.88 ~~\$48.88~~****REGISTRANT CONTACT**

Name: Felix Sater
 Street: 130 Shore Road
 Suite 200
 City: port washington
 State: New York
 Postal Code: 11050
 Country: US
 Phone: +1.9176042000
 Email: **kyudin11@gmail.com**

ADMINISTRATIVE CONTACT

Name: Felix Sater
 Street: 130 Shore Road
 Suite 200
 City: port washington
 State: New York
 Postal Code: 11050
 Country: US
 Phone: +1.9176042000
 Email: **kyudin11@gmail.com**

TECHNICAL CONTACT

Name: Felix Sater
 Street: 130 Shore Road
 Suite 200
 City: port washington
 State: New York
 Postal Code: 11050
 Country: US
 Phone: +1.9176042000
 Email: **kyudin11@gmail.com**

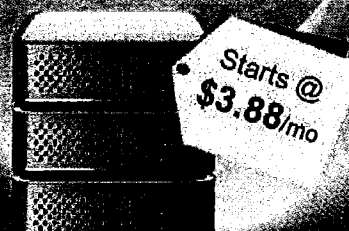
RAW WHOIS DATA

Domain Name: JODYKRISS.COM
 Registry Domain ID: 1732972689_DOMAIN_COM-VRSN
 Registrar WHOIS Server: whois.godaddy.com
 Registrar URL: http://www.godaddy.com
 Update Date: 2016-07-11T08:00:20Z

Web Hosting

Easy. Reliable. Affordable.

- 100GB Free Space
- 100MB Free Bandwidth
- 100GB Free Email
- Unlimited Email Accounts
- 30 Day Money Back Guarantee

View Plans

Creation Date: 2012-07-10T16:01:30Z
 Registrar Registration Expiration Date: 2017-07-10T16:01:30Z
 Registrar: GoDaddy.com, LLC
 Registrar IANA ID: 146
 Registrar Abuse Contact Email: abuse@godaddy.com
 Registrar Abuse Contact Phone: +1.4806242505
 Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>
 Domain Status: clientUpdateProhibited <http://www.icann.org/epp#clientUpdateProhibited>
 Domain Status: clientRenewProhibited <http://www.icann.org/epp#clientRenewProhibited>
 Domain Status: clientDeleteProhibited <http://www.icann.org/epp#clientDeleteProhibited>
 Registry Registrant ID: Not Available From Registry
 Registrant Name: Felix Sater
 Registrant Organization:
 Registrant Street: 130 Shore Road
 Registrant Street: Suite 200
 Registrant City: port washington
 Registrant State/Province: New York
 Registrant Postal Code: 11050
 Registrant Country: US
 Registrant Phone: +1.9176042000
 Registrant Phone Ext:
 Registrant Fax:
 Registrant Fax Ext:
 Registrant Email: kyudin11@gmail.com
 Registry Admin ID: Not Available From Registry
 Admin Name: Felix Sater
 Admin Organization:
 Admin Street: 130 Shore Road
 Admin Street: Suite 200
 Admin City: port washington
 Admin State/Province: New York
 Admin Postal Code: 11050
 Admin Country: US
 Admin Phone: +1.9176042000
 Admin Phone Ext:
 Admin Fax:
 Admin Fax Ext:
 Admin Email: kyudin11@gmail.com
 Registry Tech ID: Not Available From Registry
 Tech Name: Felix Sater
 Tech Organization:
 Tech Street: 130 Shore Road
 Tech Street: Suite 200
 Tech City: port washington
 Tech State/Province: New York
 Tech Postal Code: 11050
 Tech Country: US
 Tech Phone: +1.9176042000
 Tech Phone Ext:
 Tech Fax:
 Tech Fax Ext:
 Tech Email: kyudin11@gmail.com
 Name Server: NS13.DOMAINCONTROL.COM
 Name Server: NS14.DOMAINCONTROL.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
 >>> Last update of WHOIS database: 2017-02-09T11:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

The data contained in GoDaddy.com, LLC's WhoIs database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

related domain names

godaddy.com domaincontrol.com icann.org gmail.com internic.net

Domains

Register Domain Name
View Domain Pricing
Bulk Domain Register
Bulk Domain Transfer
Whois Lookup
Name Suggestion Tool
Free with Every Domain
Domain Offers

Infrastructure

Datacenter Details
Hosting Security
24 x 7 Servers Monitoring
Backup and Recovery

Hosting & Products

Linux Hosting
Windows Hosting
Linux Reseller Hosting
Windows Reseller Hosting
Virtual Private Servers
Dedicated Servers
Managed Servers
Cloud Hosting
Website Builder
Business Email
Enterprise Email
SSL Certificates
Sitelock
Codeguard

Support

View Knowledge Base
Contact Support
Report Abuse
About Whois

Follow us



LOGIN

OR

CREATE AN ACCOUNT



Get your .SPACE at just
\$1.48!

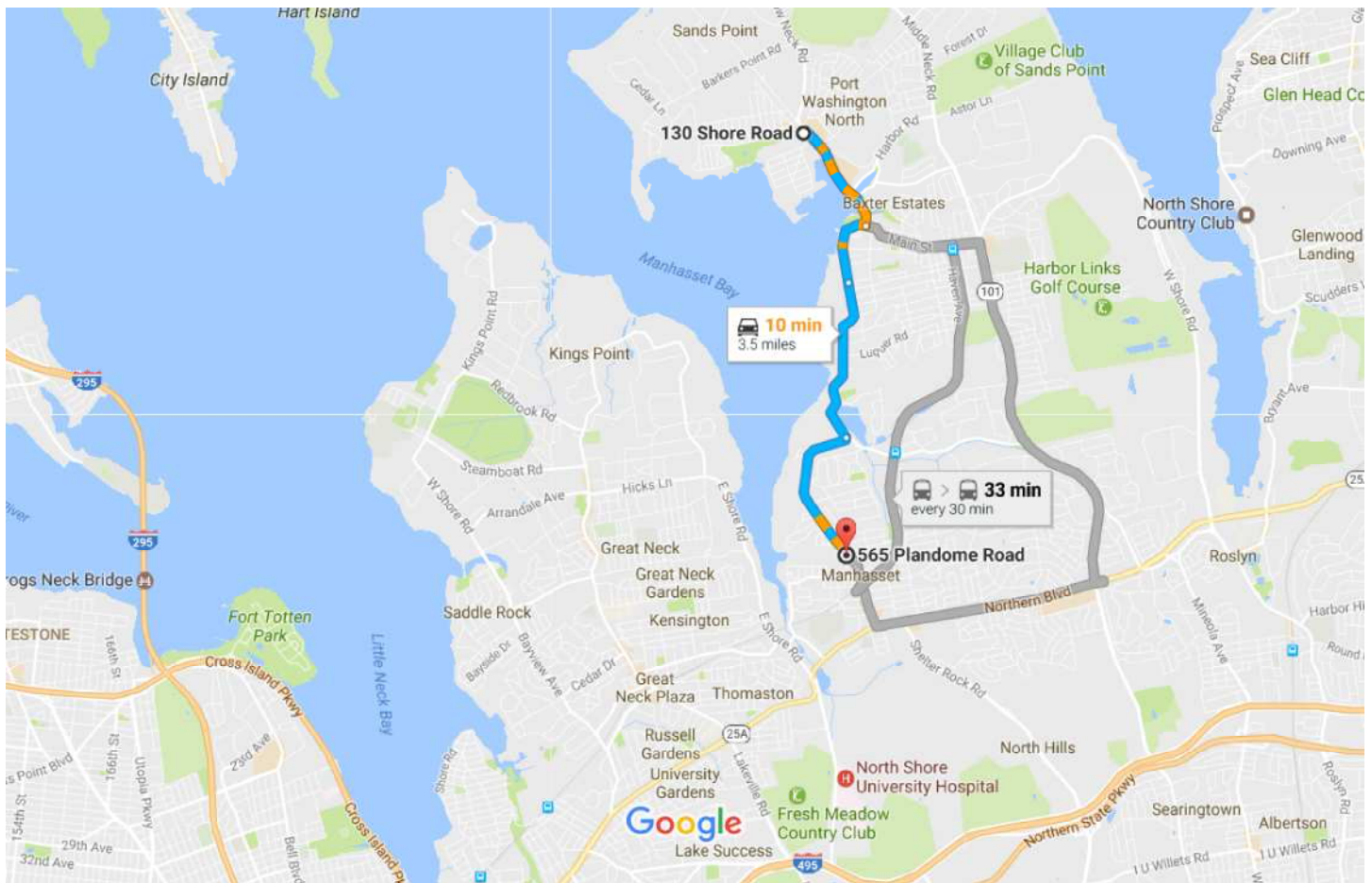
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EXHIBIT 9



130 Shore Rd, Port Washington, NY 11050 to 565 Plandome Rd, Manhasset, NY 11030

Drive 3.5 miles, 10 min



Map data ©2017 Google 1 mi

via N Plandome Rd and Plandome Rd

Fastest route, despite the usual traffic

10 min

3.5 miles

5:32 PM—6:23 PM

51 min

n23 n20H

6:03 PM—6:36 PM

33 min

n23 Port Washington

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Yudina et al.

v.

Kriss et al.

Case No. 2:16-CV-00932-DJH

**DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER RE: DEPOSITIONS OF LARISSA YUDINA AND
OST GROUP (Dkt. 36.)**

Exhibit B: Declaration of Jody Kriss

Gregory B. Collins (#023154)
KERCSMAR & FELTUS PLLC
7150 East Camelback Road, Suite 285
Scottsdale, Arizona 85251
(480) 421-1001
(480) 421-1002 fax
gbc@kflawaz.com

Adam C. Sherman (pro hac vice)
VORYS, SATER, SEYMOUR AND PEASE LLP
301 East Fourth Street
Suite 3500, Great American Tower
Cincinnati, Ohio 45202
Phone: (513) 723-4680
Fax: (513) 852-8468
acsherman@vorys.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

LARISSA YUDINA, an individual;
FELIX SATER, an individual; and OST
GROUP, a foreign entity;

Plaintiffs,

vs.

JODY KRISS, an individual; and EAST
RIVER PARTNERS, LLC, a foreign
corporation; (posting on various websites)

Defendants.

Case No. 2:16-cv-00932-DJH

**DECLARATION OF JODY KRISS IN
SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER RE:
DEPOSITIONS OF LARISSA YUDINA
AND OST GROUP (Dkt. 36.)**

1 I, Jody Kriss, declare and state as follows:

2 1. I am over 18 years of age and, unless otherwise specified, the matters set forth
3 herein are based upon my personal knowledge. If called to testify, I could testify to these
4 facts.

5 2. I have never met and have no acquaintance with any individuals named
6 Larissa Yudina or Konstantin Yudin. Likewise I have no acquaintance with an entity called
7 OST Group.

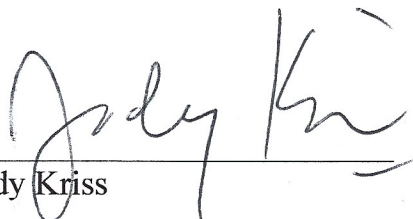
8 3. The first time I had ever heard of Larissa Yudina, Konstantin Yudin and OST
9 Group was when I investigated who was behind the creation of the internet domains that
10 are the subject of the above-captioned lawsuit.

11 FURTHER DECLARANT SAETH NAUGHT.

12 I declare under penalty of perjury under the laws of the United States of America
13 and the state of Arizona that the foregoing is true and accurate to the best of my knowledge,
14 information, and belief.

15 Executed this 9th day of February 2017 at New York, New York.

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Jody Kriss